

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

)  
MARC VEASEY, JANE ) CIVIL ACTION  
HAMILTON, SERGIO DELEON, )  
FLOYD J. CARRIER, ANNA ) NO. 2:13-CV-193 (NGR)  
BURNS, MICHAEL MONTEZ, ) [Lead case]  
PENNY POPE, OSCAR ORTIZ, )  
KOBY OZIAS, JOHN )  
MELLOR-CRUMLEY, PEGGY )  
HERMAN, EVELYN BRICKNER, )  
GORDON BENJAMIN, KEN )  
GANDY, LEAGUE OF UNITED )  
LATIN AMERICAN CITIZENS )  
(LULAC), AND DALLAS )  
COUNTY, TEXAS, )  
)  
Plaintiffs, )  
)  
V. )  
)  
RICK PERRY, GOVERNOR OF )  
TEXAS AND JOHN STEEN, )  
TEXAS SECRETARY OF STATE, )  
)  
Defendants. )

<p>2</p> <p>1 UNITED STATES OF AMERICA, )  2 ) CIVIL ACTION  3 Plaintiffs, )  4 ) NO. 2:13-CV-263 (NGR)  5 TEXAS LEAGUE OF YOUNG ) [Consolidated case]  6 VOTERS EDUCATION FUND, )  7 IMANI CLARK, AURICA )  8 WASHINGTON, CRYSTAL )  9 OWENS, AND MICHELLE )  10 BESSIAKE, )  11 )  12 Plaintiff-Intervenors, )  13 )  14 TEXAS ASSOCIATION OF )  15 HISPANIC COUNTY JUDGES )  16 AND COUNTY COMMISSIONERS, )  17 HIDALGO COUNTY, AND MARIA )  18 LONGORIA BENAVIDES, )  19 )  20 Plaintiff-Intervenors, )  21 )  22 V. )  23 )  24 STATE OF TEXAS, JOHN )  25 STEEN, IN HIS OFFICIAL )  CAPACITY AS TEXAS )  SECRETARY OF STATE; AND )  STEVE McCRAW, IN HIS )  OFFICIAL CAPACITY AS )  DIRECTOR OF THE TEXAS )  DEPARTMENT OF PUBLIC )  SAFETY, )  Defendants. )</p>	<p>4</p> <p>1 *****  2 ORAL REALTIME DEPOSITION OF  3 BLAKE EARL GREEN  4 JUNE 18, 2014  5 *****  6 ORAL REALTIME DEPOSITION OF BLAKE EARL GREEN,  7 produced as a witness at the instance of the  8 DEFENDANTS, and duly sworn, was taken in the  9 above-styled and numbered cause on the 18th of May,  10 2014, from 10:03 a.m. to 3:46 p.m., before Tamara  11 Vinson, CSR in and for the State of Texas, reported by  12 machine shorthand, at the Texas Southern University,  13 3100 Cleburne Street, Dean's Conference Room, Houston,  14 Texas, 77004, pursuant to the Federal Rules of Civil  15 Procedure and the provisions stated on the record or  16 attached hereto.  17  18  19  20  21  22  23  24  25</p>
<p>3</p> <p>1 TEXAS STATE CONFERENCE OF )  2 NAACP BRANCHES; AND THE ) CIVIL ACTION  3 MEXICAN AMERICAN )  4 LEGISLATIVE CAUCUS OF THE ) NO. 2:13-CV-291 (NGR)  5 TEXAS HOUSE OF ) [Consolidated case]  6 REPRESENTATIVES, )  7 )  8 Plaintiffs, )  9 )  10 V. )  11 )  12 JOHN STEEN, IN HIS )  13 OFFICIAL CAPACITY AS )  14 TEXAS SECRETARY OF STATE; )  15 AND STEVE McCRAW, IN HIS )  16 OFFICIAL CAPACITY AS )  17 DIRECTOR OF THE TEXAS )  18 DEPARTMENT OF PUBLIC )  19 SAFETY, )  20 )  21 Defendants. )  22 )  23 BELINDA ORTIZ, LENARD ) CIVIL ACTION  24 TAYLOR, EULALIO MENDEZ )  25 JR., LIONEL ESTRADA; ) NO. 2:13-CV-348 (NGR)  ESTELA GARCIA ESPINOSA, ) [Consolidated case]  ROXANNE HERNANDEZ, LYDIA )  LARA, MARGARITO MARTINEZ )  LARA, MAXIMINA MARTINEZ )  LARA, AND LA UNION DEL )  PUEBLO ENTERO, INC. )  Plaintiffs, )  V. )  JOHN STEEN, IN HIS )  OFFICIAL CAPACITY AS )  TEXAS SECRETARY OF STATE; )  AND STEVE McCRAW, IN HIS )  OFFICIAL CAPACITY AS )  DIRECTOR OF THE TEXAS )  DEPARTMENT OF PUBLIC )  SAFETY )  Defendants. )</p>	<p>5</p> <p>1 A P P E A R A N C E S  2  3 FOR THE PLAINTIFF-INTERVENORS TEXAS LEAGUE OF YOUNG  4 VOTERS EDUCATION FUND, IMANI CLARK, AURICA WASHINGTON,  5 CRYSTAL OWENS, AND MICHELLE BESSIAKE:  6  7 MS. DANIELLE Y. CONLEY  8 WilmerHale  9 1875 Pennsylvania Avenue, NW  10 Washington, DC 20006  11 202.663.6006 Fax 202.663.6363  12 danielle.conley@wilmerhale.com  13 - and -  14 MR. RYAN P. HAYGOOD  15 MS. NATASHA M. KORGAKONKAR  16 NAACP  17 40 Rector Street, 5th Floor  18 New York, New York 10006-1738  19 212.965.7712 Fax 212.226.7592  20 rhaygood@naacpldf.org  21 nkorgakonkar@naacpldf.org  22  23 FOR THE PLAINTIFF UNITED STATES OF AMERICA  24 MS. ANGELA J. MILLER  25 (Appearing via speaker phone)  Trial Attorney  Voting Section  Civil Rights Division  U.S. Department of Justice  202.514.2919 Fax 202.307.3961  angela.miller5@usdoj.gov  FOR THE DEFENDANTS THE STATE OF TEXAS, RICK PERRY,  JOHN STEEN AND STEVEN McCRAW:  MR. STEPHEN L. TATUM, JR.  Assistant Attorney General  Opinion Committee  P.O. Box 12548  Austin, Texas 78711-2548  512.463.2110 Fax 512.472.6538  stephen.tatum@texasattorneygeneral.gov</p>

6

1 ALSO PRESENT:

2 Ms. Tamara Vinson, Court Reporter

8

1 EXHIBIT INDEX  
PAGE

2	Exhibit No. 1.....	21
3	Defendants' First Amended Notice of	
4	Intention to Take Oral Deposition of	
5	Texas League of Young Voters Education	
6	Fund	
7	Exhibit No. 2.....	25
8	The League of Young Voters Education Fund	
9	Mission and Purpose	
10	Exhibit No. 3.....	30
11	The League of Young Voters Education Fund	
12	List of constituency	
13	Exhibit No. 4.....	56
14	Voter ID Project Coalition Meeting	
15	tonight	
16	Exhibit No. 5.....	61
17	Amended Complaint in Intervention of	
18	Plaintiff-Intervenors The Texas League of	
19	Young Voters Education Fund, Imani Clark,	
20	Aurica Washington, Crystal Owens, and	
21	Michelle Bessiake	
22	Exhibit No. 6.....	80
23	LDF - Comment Under Section 5 of the	
24	Voting Rights Act	
25	Exhibit No. 7.....	116
	Texas Politics - Voter Identification	
	February 2011	
	Exhibit No. 8.....	119
	Texas Politics - Voter Identification	
	February 2011	
	Exhibit No. 9.....	122
	Texas Politics - Voter Identification	
	February 2011	
	Exhibit No. 10.....	135
	Election Protection and Access to the	
	Ballot in Texas	

7

## 1 INDEX

## 2 PAGE

3	Appearances.....	5-6
4		
5	BLAKE EARL GREEN	
6	Examination by Mr. Tatum.....	9
7	Examination by Ms. Korgaonkar.....	156
8	Signature requested.....	159
9	Reporter's Certificate.....	161

9

1 BLAKE EARL GREEN,

2 having been first duly sworn, testified as follows:

## 3 EXAMINATION

4 QUESTIONS BY MR. TATUM:

5 Q. Mr. Green, my name is Stephen Tatum. I'm  
6 with the Texas Attorney General's office and I'm  
7 representing the State of Texas in this lawsuit.  
8 Would you please state and spell your full  
9 name for the record, please?

10 A. Sure. Blake Earl Green. That's B-L-A-K-E,  
11 E-A-R-L, and last name Green, G-R-E-E-N.

12 Q. Thank you.

13 MR. TATUM: At this point, I think we  
14 should go around the room and make introductions.  
15 We've already introduced ourselves, so we can start  
16 here.

17 MS. KORGAONKAR: Okay. This is Natasha  
18 Korgaonkar from the NAACP Legal Defense Fund on behalf  
19 of the Texas League of Young Voters.

20 MS. CONLEY: Danielle Conley from  
21 WilmerHale also on behalf of the Texas League of Young  
22 Voters.

23 MR. HAYGOOD: And this is Ryan Haygood  
24 of the NAACP Legal Defense and Educational Fund, also  
25 with the Texas League of Young Voters.

10

1 MS. MILLER: And on the phone, I'm  
2 Angela Miller from the U.S. Department of Justice.  
3 MR. TATUM: Thank you, everybody.  
4 Q. (By Mr. Tatum) Mr. Green, are you  
5 represented by counsel today?  
6 A. Yes.  
7 Q. And who is that?  
8 A. It's Natasha Korgaonkar with LDF, Ryan  
9 Haygood with LDF, as well. And, also, Danielle Conley  
10 with WilmerHale.  
11 Q. Mr. Green, have you ever been deposed before?  
12 A. No.  
13 Q. Okay. Well, I'm going to go over some --  
14 some ground rules that will control this deposition.  
15 First and foremost, I will be asking you some  
16 questions. And I ask that you give me verbal answers  
17 to those questions for the court reporter, so she can  
18 get a clean record. This means, you know, please do  
19 not shake your head for "no" or nod your head for  
20 "yes." Just say "yes" or "no."  
21 On that note, I'll ask that you please let me  
22 finish my question before you begin your answer and  
23 I'll try to do the same for you. Again, this is for  
24 the court reporter, so she can get an accurate  
25 transcription of everything that's said here today.

12

1 prevent you from providing accurate and truthful  
2 answers to my question?  
3 A. No.  
4 Q. Are you taking any medications that would  
5 affect your ability to provide accurate and truthful  
6 answers to my questions?  
7 A. No.  
8 Q. Is there anything else that might prevent you  
9 from answering my questions truthfully and accurately  
10 today?  
11 A. No.  
12 Q. Mr. Green, I want to talk about -- just get  
13 some general background information from you. Where  
14 were you born?  
15 A. Here in Houston.  
16 Q. In Houston. And when were you born?  
17 A. In 1983.  
18 Q. So that makes you thirty-one?  
19 A. It will make me thirty-one at the end of this  
20 year, correct.  
21 Q. And where do you reside here in Houston?  
22 A. In terms of neighborhood?  
23 Q. Yes, sure.  
24 A. Medical Center.  
25 Q. Okay. Do you have any brothers or sisters?

11

1 Probably easier said than done, it's possible  
2 that we may talk over each other at some point, but  
3 I'd just ask that we do our best to let each other  
4 finish before speaking. Do you understand?  
5 A. Yes.  
6 Q. Okay. If you don't understand a question or  
7 you didn't hear it clearly or you need it repeated,  
8 please say so. I'll rephrase it, I'll repeat it, do  
9 whatever I can to make you -- make sure you understand  
10 the question that I'm asking you. Okay?  
11 A. Okay.  
12 Q. Now, there may be times today when your  
13 attorney may object to a question that I ask. At that  
14 point, I'll still need you to answer the question  
15 unless your attorney specifically instructs you not to  
16 answer. Do you understand?  
17 A. Yes.  
18 Q. Okay. Now, you understand that you're under  
19 oath, which means that you must answer all my  
20 questions truthfully or risk the penalty of perjury.  
21 Do you understand?  
22 A. Yes.  
23 Q. Okay. Mr. Green, how are you feeling today?  
24 A. Good.  
25 Q. Are you suffering from any illness that would

13

1 MS. KORGAONKAR: Objection as to  
2 relevance. You can answer.  
3 A. Yes.  
4 Q. (By Mr. Tatum) Okay. Mr. Green, where did  
5 you go to school?  
6 A. Texas Southern University.  
7 Q. And did you attend graduate school after  
8 that?  
9 A. I did.  
10 Q. And where did you attend graduate school?  
11 A. Texas Southern University.  
12 Q. Okay. And what degree did you attain in  
13 graduate school?  
14 A. M.B.A., Master of Business.  
15 Q. Mr. Green, what was your first job after  
16 school?  
17 A. I don't remember. After my -- after which --  
18 which degree?  
19 Q. After you received your M.B.A.  
20 A. After my M.B.A., I -- after my M.B.A. --  
21 after my M.B.A., I -- after my M.B.A. -- and that was  
22 back in 2008. Correct? Okay.  
23 Q. If you don't recall, that's okay.  
24 A. No. I recall. I'm trying to remember. It's  
25 -- it was -- it was here, uh-huh.

14

1 Q. Here at Texas Southern University?  
 2 A. Correct, uh-huh.  
 3 Q. And what was that job?  
 4 A. I managed their executive M.B.A. program.  
 5 Q. And how long did you do that for?  
 6 A. I think about -- about -- about -- about two  
 7 years.  
 8 Q. And what did you do after your job at Texas  
 9 Southern University?  
 10 A. I joined the League of Young Voters.  
 11 Q. And what year was that?  
 12 A. 2010.  
 13 Q. So are you employed with the Texas League of  
 14 Young Voters?  
 15 A. Were I employed?  
 16 Q. Are you currently employed with the Texas  
 17 League of Young Voters?  
 18 A. Yes.  
 19 Q. And I'll just say right now, for the rest of  
 20 this deposition, I'll probably just refer to the Texas  
 21 League, if that's okay.  
 22 A. That's fine.  
 23 Q. It's kind of a long name and it just can get  
 24 a little marble-mouthed. So just for simplification  
 25 purposes, when I say the "Texas League," I'm referring

16

1 A. Just looking at where the -- where the -- you  
 2 know -- where the organization want to go long term,  
 3 just looking at -- you know -- you know -- the  
 4 programs we want to implement and how to go about  
 5 doing it.  
 6 Q. And who do you report to?  
 7 A. Our state director.  
 8 Q. And who is that?  
 9 A. Christina Sanders.  
 10 Q. And you report directly to her?  
 11 A. Yes.  
 12 Q. Do you interact with her on a daily basis?  
 13 A. Yes.  
 14 Q. Do you manage anyone?  
 15 A. Do I manage anyone?  
 16 Q. Yes. Are you in charge of managing the  
 17 employment of anyone below you?  
 18 A. Yes.  
 19 Q. And how many people do you manage?  
 20 A. Three.  
 21 Q. Three?  
 22 A. (No verbal response.)  
 23 Q. And who are those people?  
 24 A. Arianna Williams, Raymonda Mack, as well as  
 25 Nyree Mack.

15

1 to the Texas League of Young Voters.  
 2 A. Uh-huh.  
 3 Q. Okay. So you're currently employed with the  
 4 Texas League. Correct?  
 5 A. Correct.  
 6 Q. And what is your title at the Texas League?  
 7 A. Deputy state director.  
 8 Q. And how long have you held that position?  
 9 A. Since 2010.  
 10 Q. Since 2010. Is that a paid position?  
 11 A. Yes.  
 12 Q. Is that full-time position?  
 13 A. Yes.  
 14 Q. Are you based here in Houston?  
 15 A. Yes.  
 16 Q. What are your official duties and  
 17 responsibilities as deputy state director of the Texas  
 18 League?  
 19 A. I assist the state director with the vision  
 20 and -- with the vision and goals for the organization,  
 21 as well as manage the operations and the -- the  
 22 efficiency of our programs.  
 23 Q. When you say assist in the vision -- I  
 24 believe that's what you said -- what exactly does that  
 25 entail?

17

1 Q. Could you spell that last name, please?  
 2 A. Mack, M-A-C-K.  
 3 Q. And what was the first name?  
 4 A. Nyree, N-Y-R-E-E.  
 5 Q. So those three people, they report directly  
 6 to you. Correct?  
 7 A. Correct, uh-huh.  
 8 Q. Could you describe a typical day at the Texas  
 9 League in your role as deputy state director?  
 10 A. A typical day would be meeting with staff,  
 11 you know, looking at what's -- what's ahead for the  
 12 day, and then going about making sure we do everything  
 13 necessary to execute the day's activities.  
 14 Q. Are you involved in any kind of budgeting or  
 15 resource allocation decisions within the Texas League?  
 16 A. In some capacity, yes.  
 17 Q. Okay. And what capacity is that?  
 18 A. I mean, just as state director -- I mean, as  
 19 deputy state director, you know, I have some -- some  
 20 -- some -- some oversight of it with the state  
 21 director, as well.  
 22 Q. Is there -- would you say that the state  
 23 director -- Christina Sanders. Correct?  
 24 A. Correct.  
 25 Q. -- and yourself and the three people you

18

1 manage, do you all comprise some sort of -- is that  
 2 some sort of executive committee of the Texas League  
 3 or is there an executive committee of the Texas  
 4 League?  
 5 A. Executive committee, no.  
 6 Q. So how is -- who else, besides the people  
 7 we've already named, are involved in major decisions  
 8 affecting the operations of the Texas League?  
 9 A. In major decisions?  
 10 Q. Yes.  
 11 A. Well, we have an national organization that  
 12 -- that we -- I mean, that we speak to in terms of our  
 13 -- our finances and budget.  
 14 Q. And do you interact with the national  
 15 organization on a daily basis?  
 16 A. Yes.  
 17 Q. Mr. Green, do you vote?  
 18 A. I do.  
 19 Q. When was the last time you voted?  
 20 MS. KORGAONKAR: Objection as to  
 21 relevance. And I'd just like to state for the record  
 22 that this is a 30(b)(6), so he's here to testify on  
 23 behalf of the League, as opposed to himself.  
 24 Q. (By Mr. Tatum) Okay. You may answer the  
 25 question.

19

1 A. The last time I voted was in the May -- I  
 2 believe, the May primary.  
 3 Q. Okay. Have you ever been unable to vote?  
 4 MS. KORGAONKAR: Same objection, but you  
 5 can answer the question.  
 6 A. No, not that I'm aware of.  
 7 Q. (By Mr. Tatum) Okay. Mr. Green, what did  
 8 you do to prepare for this deposition today?  
 9 A. I had meetings with my counsel.  
 10 Q. Are those counsel in the room here today?  
 11 A. Correct.  
 12 Q. And when did you met with them?  
 13 A. I met with them on several occasions.  
 14 Q. And when was the last time you met with them?  
 15 A. The last time I met with them?  
 16 Q. Yes.  
 17 A. Today.  
 18 Q. And for how long was that?  
 19 A. For about an hour.  
 20 Q. And you said several occasions. What were  
 21 the previous occasions that you met with your counsel  
 22 here today in preparation for this deposition?  
 23 A. The previous occasions, we met yesterday and  
 24 on several different occasions for the past, I guess,  
 25 couple of weeks.

20

1 Q. So about how long did you spend preparing for  
 2 this deposition?  
 3 A. How -- specifically how long, I don't -- I  
 4 don't recall. In terms of time, I don't recall.  
 5 Q. How long was your meeting with counsel  
 6 yesterday?  
 7 MS. KORGAONKAR: Mr. Green, I'll caution  
 8 you to answer this question, but to not reveal the  
 9 contents of any conversations that you may have had  
 10 with any counsel in this case. You can answer this  
 11 question.  
 12 A. Periodically throughout the day.  
 13 Q. (By Mr. Tatum) I'm sorry?  
 14 A. Periodically throughout the day.  
 15 Q. That was yesterday?  
 16 A. Yes.  
 17 Q. Did you meet with counsel on Monday?  
 18 A. On Monday? Today is Wednesday. Monday, I  
 19 don't believe so.  
 20 Q. Did you meet or confer with anyone else  
 21 besides the counsel here in this room today in  
 22 preparation for this deposition?  
 23 A. No.  
 24 Q. Did you review any documents in preparation  
 25 for this deposition?

21

1 A. In terms of a notice, I reviewed the notice.  
 2 Q. Did you review any other documents?  
 3 A. Any other documents? No, not that I can  
 4 recall.  
 5 Q. So, in preparation for this deposition, you  
 6 only reviewed the notice? And by that I mean the  
 7 30(b)(6) notice.  
 8 A. Correct.  
 9 Q. Okay. Did you bring any documents with you  
 10 today?  
 11 A. No.  
 12 Q. Is there anything else you did to prepare for  
 13 this deposition that you have not already mentioned?  
 14 A. Not that I can recall, no.  
 15 Q. Okay.  
 16 MR. TATUM: I just mark one of these.  
 17 Right?  
 18 THE REPORTER: Yes.  
 19 MR. TATUM: Okay.  
 20 (Exhibit No. 1 marked.)  
 21 Q. (By Mr. Tatum) Mr. Green, I'm handing you  
 22 what's been marked as Exhibit 1.  
 23 MR. TATUM: You probably already have a  
 24 copy of it, but here's another one. (Tendering  
 25 document to Ms. Korgaonkar.)

<p style="text-align: right;">22</p> <p>1 Q. (By Mr. Tatum) If you would, please, take a 2 minute to skim over it. 3 A. Uh-huh. 4 Q. Mr. Green, do you recognize this document? 5 A. Yes. 6 Q. And what is this document? 7 A. It is a deposition notice. 8 Q. And you stated a minute ago that you reviewed 9 this notice in preparation for this deposition. 10 Correct? 11 A. Correct. 12 Q. If you would please turn to Page 5. 13 A. (Complying.) 14 Q. Are you at Page 5? 15 A. Yes. 16 Q. Okay. At the bottom of that page there's a 17 heading that says Matters, and following that heading 18 there is a series of numbered paragraphs from 1 to 31. 19 Is that correct? 20 A. That is correct. 21 Q. Okay. Are you aware that you've been 22 designated by the Texas League of Young Voters to 23 testify and give binding answers on its behalf 24 regarding the topics contained in these paragraphs? 25 A. Yes.</p>	<p style="text-align: right;">24</p> <p>1 Q. (By Mr. Tatum) Just to confirm one more time 2 just so we have it on the record, Mr. Green, is it 3 your understanding that you are not prepared to 4 testify to topics 3 through 6 and topic 24 because the 5 Texas League is not a membership organization and does 6 not, therefore, contain any lists of its members? 7 A. Correct. 8 Q. Okay. Mr. Green, other than those topics 9 that we just discussed, are you aware that you've been 10 designated by the Texas League to give truthful and 11 binding answers on its behalf regarding all of the 12 other topics contained in these paragraphs? 13 A. That's correct. 14 Q. Okay. And are you prepared to testify about 15 those topics? 16 A. Yes. 17 Q. Okay. And you kind of already said this, but 18 are there any other topics on this list that you're 19 not prepared to testify to? 20 A. No. 21 Q. Okay. I want to ask you some questions, some 22 general questions about the Texas League. How long 23 has it be in existence? 24 A. Since 2010. 25 Q. And just generally, how was it formed?</p>
<p style="text-align: right;">23</p> <p>1 MS. KORGAONKAR: I'd just like to note 2 for the record that we filed objections to this 3 notice. 4 MR. TATUM: Uh-huh. 5 MS. KORGAONKAR: And I'm sure that 6 counsel has those objections. I'd also like to note 7 that topics 3 through 6 pertain to the identity of 8 members and that that's been resolved by stipulation 9 through counsel. 10 Q. (By Mr. Tatum) And, Mr. Green, what she's 11 referring to is a statement made that the Texas League 12 of Young Voters is not a membership organization and, 13 therefore, does not have any kind of membership list. 14 Is that your understanding? 15 A. It is. 16 Q. Is that a correct statement? 17 A. Yes. 18 Q. Okay. 19 MS. KORGAONKAR: And sorry. Just for 20 the record, also, topic 24 is affected by that 21 stipulation, as well. 22 MR. TATUM: Okay. 23 MS. KORGAONKAR: It's 3 through 6 and 24 24. 25 MR. TATUM: All right.</p>	<p style="text-align: right;">25</p> <p>1 A. How was it formed? 2 Q. Yeah. How was -- who -- who initiated the 3 process that brought the Texas League into existence? 4 Who was involved in that process? 5 A. It was our current state director and the 6 international organization. 7 Q. So you said it was in 2010 is when the Texas 8 League was formed? 9 A. Correct. 10 Q. Okay. And it is an affiliate of the national 11 organization? 12 A. That's correct. 13 Q. Okay. 14 (Exhibit No. 2 marked.) 15 Q. Mr. Green, I'm handing you what's been marked 16 as Exhibit 2. 17 A. Uh-huh. 18 Q. I represent to you that this document has 19 been produced to Defendants in this litigation. Do 20 you recognize this document? 21 A. I do. 22 Q. And what is this document? 23 A. It is our mission and purpose of the 24 organization. 25 Q. So this is the stated mission of the Texas</p>



<p style="text-align: right;">26</p> <p>1 League of Young Voters. Correct?</p> <p>2 A. That's correct.</p> <p>3 Q. Is this mission started by the national</p> <p>4 organization?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. Does the Texas League operate for</p> <p>7 profit?</p> <p>8 A. For profit, no.</p> <p>9 Q. So it is a nonprofit organization?</p> <p>10 A. Correct.</p> <p>11 Q. And how is it -- where does it get its</p> <p>12 funding?</p> <p>13 A. From foundations, as well as from individual</p> <p>14 donors.</p> <p>15 Q. What kind of foundations provide funding to</p> <p>16 the Texas League?</p> <p>17 MS. KORGAONKAR: Objection as to</p> <p>18 relevance.</p> <p>19 A. The kind of foundations, those that are --</p> <p>20 those that are -- who are socially responsible and who</p> <p>21 support the work of increasing civic participation</p> <p>22 here in this country.</p> <p>23 Q. (By Mr. Tatum) Can you give examples of some</p> <p>24 of the organizations that provide funding to the Texas</p> <p>25 League?</p>	<p style="text-align: right;">28</p> <p>1 yes, uh-huh.</p> <p>2 Q. And what kinds of activities are those?</p> <p>3 A. Making -- really just making calls to our --</p> <p>4 to donor bases.</p> <p>5 Q. Within the Texas League, who decides -- and</p> <p>6 you kind of touched on this earlier -- who decides how</p> <p>7 its funds are used?</p> <p>8 MS. KORGAONKAR: Objection. This is</p> <p>9 beyond the scope of the notice, but you can answer.</p> <p>10 A. It's pretty much a joint -- a joint -- a</p> <p>11 joint decision between myself and the state director.</p> <p>12 Q. (By Mr. Tatum) It's a joint decision --</p> <p>13 (Reporter interruption.)</p> <p>14 Q. (By Mr. Tatum) And I'll try to slow down, as</p> <p>15 well. Now, we've already talked about how the Texas</p> <p>16 League is not a membership organization. Who does the</p> <p>17 Texas League serve?</p> <p>18 A. We serve a constituent -- a constituent base</p> <p>19 of people who has volunteered with us, either took an</p> <p>20 action or signed a -- signed a pledge -- a pledge to</p> <p>21 vote card.</p> <p>22 Q. So just to kind of repeat what you said, is</p> <p>23 it correct -- so you have constituents. Is that</p> <p>24 correct?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">27</p> <p>1 MS. KORGAONKAR: Same objection, but you</p> <p>2 can answer.</p> <p>3 A. In terms of names or. . .</p> <p>4 Q. (By Mr. Tatum) Yes.</p> <p>5 A. We have the Ford Foundation, Open Society</p> <p>6 Institute -- well, Open Society Foundation. And those</p> <p>7 are the pretty much the extent.</p> <p>8 Q. You said the other source of funding is</p> <p>9 individual donations. Correct?</p> <p>10 A. Correct.</p> <p>11 Q. Are there any other sources of founding that</p> <p>12 the Texas League receives?</p> <p>13 A. Other sources of funding besides -- besides</p> <p>14 -- we do receive some allocation from our national</p> <p>15 organization.</p> <p>16 Q. Is that funding from the national</p> <p>17 organization, is that received on an annual basis?</p> <p>18 MS. KORGAONKAR: Objection, again, as to</p> <p>19 relevance. And I think that this whole line is</p> <p>20 actually beyond the scope of the notice, but you can</p> <p>21 answer this question.</p> <p>22 A. Yes.</p> <p>23 Q. (By Mr. Tatum) Do y'all conduct any kind of</p> <p>24 fundraising activities?</p> <p>25 A. Fundraising activities? To a certain extent,</p>	<p style="text-align: right;">29</p> <p>1 Q. And one becomes a constituent by -- or can</p> <p>2 you explain again how one becomes a constituent of the</p> <p>3 Texas League?</p> <p>4 A. Right. One becomes a constituent by either,</p> <p>5 you know, volunteering with our organization, you</p> <p>6 know, attending an event of some sort, you know,</p> <p>7 signing a pledge card after, you know, registering</p> <p>8 them to vote or if they, in particular, took a</p> <p>9 specific action with our organization.</p> <p>10 Q. And what kind of specific action are you</p> <p>11 talking about or can you give an example of a specific</p> <p>12 action?</p> <p>13 A. Right. They may have signed a petition of</p> <p>14 some sort.</p> <p>15 Q. Okay. Does the Texas League maintain any</p> <p>16 kind of list of constituents that you just described?</p> <p>17 A. We do, uh-huh.</p> <p>18 Q. Does the Texas League actively recruit new</p> <p>19 constituents?</p> <p>20 MS. KORGAONKAR: Objection for</p> <p>21 vagueness. I don't know what you mean by "recruit."</p> <p>22 THE WITNESS: Right.</p> <p>23 Q. (By Mr. Tatum) Does the Texas League</p> <p>24 actively try to accumulate new constituents?</p> <p>25 A. Our main target is people between the ages of</p>



<p style="text-align: right;">30</p> <p>1 eighteen and thirty-five. And, you know, there are  2 several opportunities in which people can become part  3 of our organization. And those ways are those ways,  4 in particular.  5 Q. Okay. So you mentioned that the Texas League  6 does keep a list of constituents that is served by the  7 Texas League. Correct?  8 A. Correct.  9 Q. Do you know if that list has been produced in  10 this litigation?  11 A. It has.  12 Q. Okay.  13 (Exhibit No. 3 marked.)  14 Q. All right. Mr. Green, I'm handing you what  15 has been marked as Exhibit 3. Now, it doesn't have  16 the Bates number at the bottom, because this was  17 printed off an Excel spreadsheet, but I represent to  18 you that -- and to you, Natasha -- that this is Bates  19 No. 00000900. I also represent to you that this is a  20 partial printout --  21 A. Okay.  22 Q. -- of that document because it contains over  23 7,000 names on it, I believe, and I didn't want to  24 spend that kind of paper.  25 MS. KORGAONKAR: And Stephen, just for</p>	<p style="text-align: right;">32</p> <p>1 League or any of the other ways that one becomes a  2 constituent that you already mentioned, is their name  3 then placed on this list or another list like it?  4 A. Yes.  5 Q. Okay. So I mentioned that this document had  6 over 7,00 names. I can't remember the exact number.  7 Would you say that that number represents the total  8 constituency of the Texas League?  9 A. It represents the constituency of the Texas  10 League, in terms of those who have taken action. But,  11 you know, we represent all young people between that  12 age range of eighteen to thirty-five here in the State  13 of Texas.  14 Q. Does the Texas League represent the interests  15 of these constituents in joining this lawsuit?  16 MS. KORGAONKAR: Objection. Calls for a  17 legal conclusion. He's not an attorney. You can  18 answer the question.  19 A. We represent young people statewide, you  20 know, between the -- between the age range I  21 specified.  22 Q. (By Mr. Tatum) So it's those people on whose  23 behalf the Texas League joined this lawsuit. Is that  24 correct?  25 MS. KORGAONKAR: Same objection. That</p>
<p style="text-align: right;">31</p> <p>1 the sake of the record, that's with the prefix LYV.  2 Is that right?  3 MR. TATUM: Correct.  4 MS. KORGAONKAR: Okay.  5 Q. (By Mr. Tatum) Mr. Green, do you recognize  6 this document?  7 A. I do.  8 Q. And, again, this was in an Excel spreadsheet,  9 so it doesn't have the grid lines or anything like  10 that. What is this document?  11 A. This is a list of our constituency.  12 Q. And who compiles this list? Is there any  13 specific person who's responsible for compiling this  14 list?  15 A. I mean, there are several ways in which you  16 can be added to this list. Some of them is through  17 data entry. And then the other is through -- that's  18 -- it's pre-populated through -- through either our  19 website or any other electronic form.  20 Q. So when various people, again, in the target  21 area that you mentioned, which was eighteen to  22 thirty-five. Correct?  23 A. (No verbal response.)  24 Q. When various people volunteer for the Texas  25 League or they participate in an action of the Texas</p>	<p style="text-align: right;">33</p> <p>1 calls for a legal conclusion.  2 Q. (By Mr. Tatum) I'll rephrase the question.  3 Why did the Texas League join this lawsuit?  4 A. We joined this lawsuit because it poses a  5 burden to certain populations. And one of those key  6 populations is young people, particularly those in  7 communities of color. And it also puts a burden on  8 our organization as a whole, as well.  9 Q. We'll talk about that a little bit later. Do  10 you know if any Texas League constituents attempted to  11 intervene in this lawsuit on their own?  12 MS. KORGAONKAR: Objection. Calls for a  13 legal conclusion, but you can answer that.  14 A. I don't know.  15 Q. (By Mr. Tatum) So is it the Texas League's  16 contention that they are not representing the  17 interests of any of its constituents in joining this  18 lawsuit?  19 MS. KORGAONKAR: Objection. That also  20 calls for a legal conclusion.  21 A. Restate the question or rephrase the  22 question.  23 Q. (By Mr. Tatum) Sure. Does the Texas League  24 contend that it is not representing the interests of  25 any of its constituents in joining this lawsuit?</p>

34

1 MS. KORGAONKAR: Same objection.  
 2 A. We're actually representing, you know, young  
 3 people who are most affected by this law.  
 4 Q. (By Mr. Tatum) Are you aware that the United  
 5 States of America is a party to this lawsuit?  
 6 A. United States of America, in terms?  
 7 Q. The United States of American represented by  
 8 the Department of Justice, are you aware that they are  
 9 a party to this lawsuit?  
 10 A. I am aware.  
 11 Q. Okay. Does the Texas League contend that the  
 12 interests of the Texas League are not adequately  
 13 represented by the United States in this lawsuit?  
 14 MS. KORGAONKAR: Objection. Calls for a  
 15 legal conclusion. You can answer the question.  
 16 A. I would say the Texas League could provide  
 17 more clarity in this particular space in terms of how  
 18 young people are affected. And with that conclusion,  
 19 that information could be beneficial to the Department  
 20 of Justice.  
 21 Q. (By Mr. Tatum) So is it the Texas League's  
 22 objective in this lawsuit to provide clarity regarding  
 23 the issues that are central to this lawsuit?  
 24 A. Well, we can provide a more so "on the  
 25 ground" representation on how this law has impacted

35

1 certain populations that this law affect.  
 2 Q. And does the Texas League feel that it can  
 3 provide that representation to a better degree than  
 4 the United States of America represented by the  
 5 Department of Justice?  
 6 A. I believe so.  
 7 Q. And why do you believe so?  
 8 A. Because we're on the ground doing the work  
 9 and we -- we have firsthand account on how this law,  
 10 you know, directly impacts people here in Texas.  
 11 Q. How was the decision made to join this  
 12 lawsuit by the Texas League?  
 13 MS. KORGAONKAR: Mr. Green, I'll just  
 14 caution you here that you can answer the question, but  
 15 not reveal the contents of any conversations that you  
 16 may have had with attorneys.  
 17 THE WITNESS: Uh-huh.  
 18 MS. KORGAONKAR: You can answer the  
 19 question.  
 20 A. How do we make this decision?  
 21 Q. (By Mr. Tatum) Just generally describe the  
 22 process that led to the Texas League intervening in  
 23 this lawsuit without divulging any privileged  
 24 information.  
 25 A. Our state director met with counsel.

36

1 MS. KORGAONKAR: And I'll just caution  
 2 you --  
 3 THE WITNESS: Uh-huh.  
 4 MS. KORGAONKAR: -- that you can say  
 5 that, but not reveal any of the contents of  
 6 conversations.  
 7 THE WITNESS: Uh-huh.  
 8 Q. (By Mr. Tatum) Mr. Green, I'll ask some more  
 9 direct questions. So you mentioned that the state  
 10 director, Ms. Sanders, met with counsel. Correct?  
 11 A. Correct, uh-huh.  
 12 Q. Were you present at that meeting?  
 13 A. Were I present? No.  
 14 Q. Was anyone else present at that meeting?  
 15 A. I don't recall.  
 16 Q. Do you know if the Texas League met with any  
 17 other organizations to discuss the possibility of  
 18 joining this lawsuit?  
 19 A. I don't know. I don't think so.  
 20 Q. Do you know if the Texas League met with any  
 21 other parties to this lawsuit to discuss the  
 22 possibility of joining this lawsuit?  
 23 A. Parties, no.  
 24 Q. Was there any kind of vote taken to determine  
 25 whether the Texas League would join this lawsuit?

37

1 A. No.  
 2 Q. So would you say it was a unilateral decision  
 3 by the state director to join this lawsuit?  
 4 MS. KORGAONKAR: Objection. That  
 5 mischaracterizes his testimony.  
 6 A. Right. I mean, we -- I mean, there were some  
 7 conversations with our national office and that's  
 8 pretty much it, uh-huh.  
 9 Q. (By Mr. Tatum) So who made the ultimate  
 10 decision for the Texas League to join in lawsuit?  
 11 A. The ultimate decision was our state director.  
 12 Q. Okay. I want to go back to talking a little  
 13 bit about the activities of the Texas League, just  
 14 general activities.  
 15 A. Uh-huh.  
 16 Q. What -- could you describe the primary  
 17 general activities that the Texas League conducts?  
 18 A. Sure. We do voter registration, we do voter  
 19 education, we do what we call Get Out the Vote, and  
 20 also leadership training.  
 21 Q. This just occurred to me that these might be  
 22 listed on the mission statement that I gave to you  
 23 previously.  
 24 A. Uh-huh.  
 25 Q. I believe on that document, if you have it --

38

1 do you have it in front of you?  
 2 A. Uh-huh.  
 3 Q. It says that our organizing and programming  
 4 model can be categorized in the following key areas:  
 5 Voter registration, Get Out the Vote, which you  
 6 mentioned, Voter Education and Issue Advocacy,  
 7 Election Protection, and Leadership Development.  
 8 Are those all activities of the Texas League?  
 9 A. Correct.  
 10 Q. Okay. And in the course of carrying out  
 11 these activities, how does the Texas League  
 12 communicate with its constituents to let them know  
 13 about the activities or to organize them?  
 14 A. I mean, we do it in a variety of ways. One  
 15 of them is through -- you know -- through e-mails,  
 16 through text messages, social media, you know,  
 17 visiting campuses.  
 18 Q. And how many different campuses do y'all  
 19 visit?  
 20 A. I mean, I don't recall the number, but I  
 21 know, statewide, it's -- it's over -- it's over 25  
 22 different -- different campuses.  
 23 Q. Throughout the state?  
 24 A. Throughout the state, uh-huh.  
 25 Q. What kinds of resources are devoted to these

39

1 activities?  
 2 A. What do you mean, "kinds of resources"?  
 3 Q. What kind of monetary financial resources are  
 4 devoted to these activities?  
 5 A. I don't think I under -- I clearly don't  
 6 understand what you're -- what you're asking.  
 7 Q. Do you have to pay -- like, what do you have  
 8 to pay for to carry out these activities? Do you have  
 9 to pay for fliers? Do you have to pay people's  
 10 salaries, pay volunteers, that kind of thing?  
 11 A. Right. We have -- we have -- we pay for  
 12 salaries, we pay for the cost to put on the program,  
 13 gas, print collateral, advertising.  
 14 Q. Does the Texas League conduct any of these  
 15 activities in connection with any other organizations  
 16 in the State of Texas?  
 17 A. What do you mean? I don't understand the  
 18 question. What do you mean, "in connection"?  
 19 Q. Do you conduct these activities with any  
 20 other organization?  
 21 A. We do collaborations, yes.  
 22 Q. With what organizations?  
 23 A. Some include the Texas Organizing Project,  
 24 Mi Familia Vota, Rock the Vote. Pretty much those  
 25 that serve our -- our population, as well. Well,

40

1 Texas Freedom Network. Those who are -- who have  
 2 youth components that we work with, uh-huh.  
 3 Q. Do y'all do any work with the Texas NAACP?  
 4 A. We do -- we do some work, uh-huh.  
 5 Q. And what kind of work is that?  
 6 A. Pretty much around election protection.  
 7 Q. And what exactly does election protection  
 8 entail?  
 9 A. Well, election protection, I know they have a  
 10 1-800 number that people if people at the polls have,  
 11 you know, a problem or issue, they can call that  
 12 number. And the NAACP will have people on the other  
 13 end that receives those -- or they have attorneys who  
 14 receive those -- that information and, I guess, try to  
 15 get those issues resolved. And the only thing we do,  
 16 we just provide that number as a resource to our  
 17 constituent base if they were to have any problems at  
 18 the polls.  
 19 Q. So what -- you kind of described what the  
 20 Texas NAACP does, in terms of election protection.  
 21 What does the Texas League of Young Voters do in  
 22 regards to election protection?  
 23 A. Right. We just refer them to that number.  
 24 Q. You just refer them to that number?  
 25 A. Uh-huh.

41

1 Q. That's the extent of the Texas League  
 2 activities with regard to election protection?  
 3 A. I mean, we do poll monitoring.  
 4 Q. Poll monitoring?  
 5 A. Uh-huh.  
 6 Q. And what does that entail?  
 7 A. Poll monitoring is, you know, if someone have  
 8 a problem at the polls, they will come to us. And,  
 9 you know, we'll listen to what their issue is and, you  
 10 know, refer them to an agency or organization that  
 11 could -- that could assist with them.  
 12 Q. Are there any other activities related to  
 13 election protection that the Texas League engages in?  
 14 A. Being a voice for them and, you know, in  
 15 similar cases like this, you know, legal challenges,  
 16 but those are pretty much to the extent.  
 17 Q. Does the Texas League engage in any kind of  
 18 policy or advocacy work with regard to legislation  
 19 that's being proposed during any session of the  
 20 legislature?  
 21 A. Yes.  
 22 Q. And what kind of work do they do in that  
 23 regard?  
 24 A. Anything particularly that deals with youth  
 25 voting or voting rights.

42

1 Q. Does the Texas League provide live or written  
2 testimony during the consideration of legislation that  
3 affects youth voting?  
4 A. Yes, uh-huh.  
5 Q. And who provides that testimony?  
6 A. It's generally our state director.  
7 Q. Have you ever provided such testimony?  
8 A. No.  
9 Q. Do you have any experience at the  
10 legislature?  
11 A. (No verbal response.)  
12 Q. Let me clarify that. Have you ever worked at  
13 the legislature?  
14 A. I have.  
15 Q. And when was that?  
16 A. It was back in 2006, I believe.  
17 Q. So this was after your grad degree, but  
18 before you joined the Texas League?  
19 A. Correct.  
20 Q. And who did you work for?  
21 A. I worked for a member of the Texas House of  
22 Representatives.  
23 Q. And what member was that?  
24 A. Hubert Vo.  
25 Q. I'm sorry?

44

1 A. We don't.  
2 Q. Can you describe the Texas League's  
3 activities related to voter ID legislation that's been  
4 proposed or enacted since 2004?  
5 A. Sure. We joined a coalition where we  
6 developed the "Got ID" campaign, which was an  
7 educational campaign.  
8 We visited a number of colleges and  
9 universities to educate student voters on the new law,  
10 as well as train student leaders.  
11 We co-hosted community forums, community  
12 events, in addition to host -- well, co-hosting a  
13 voter ID clinic -- voter ID clinic.  
14 We made phone calls, you know, to our, you  
15 know, new and existing constituent base to make sure  
16 that they are aware of the new law.  
17 We monitored polling locations on election  
18 day and during the early voting period to make sure  
19 that people were aware before they stood in line that  
20 they had to present some form of ID.  
21 And on occasions, we did take a couple people  
22 to the polls -- I mean, to the -- to obtain their --  
23 to obtain an EIC.  
24 Q. So, for the more general activities that you  
25 just described, has the Texas League been engaged in

43

1 A. Hubert, Hubert Vo. Last name V-O.  
2 Q. Hubert Vo?  
3 A. Hubert Vo, uh-huh.  
4 Q. And he was a state representative?  
5 A. He was.  
6 Q. And how long did you work for him?  
7 A. It was an internship, so I would say -- to  
8 the extent that I can recall, I would say about six  
9 months. About six months to a year.  
10 Q. And that was in 2006?  
11 A. As I can recall, yes.  
12 Q. Did that period of time that you were an  
13 intern cover the 2007 legislature?  
14 A. No, I don't think so. I think it was the  
15 interim, uh-huh.  
16 Q. So you were talking about the activities that  
17 the Texas League engages in with regard to legislation  
18 that might affect its constituency. You talked about  
19 testimony given during the legislature. Is there  
20 anything else that the Texas League does in connection  
21 with legislation that affects its constituency?  
22 A. No. That's pretty much to the extent.  
23 Q. Do y'all conduct any polls of your own?  
24 A. No.  
25 Q. Do you conduct any studies of your own?

45

1 those kind of activities since 2004 with regard to any  
2 voter ID legislation?  
3 A. Did you say before 2004?  
4 Q. No. Since 2004.  
5 A. Okay. What's the question again? I'm sorry.  
6 Q. You talked -- you mentioned a bunch of  
7 activities there. And I think some of the things you  
8 mentioned were kind of more specific to SB 14.  
9 A. Uh-huh.  
10 Q. And my question was kind of generally about  
11 any voter ID legislation since 2004. And so you  
12 talked about various clinics and workshops. Is that  
13 the kind of thing that the Texas League has done in  
14 connection with voter ID legislation going all the way  
15 back to 2004?  
16 MS. KORGAONKAR: Objection. That's  
17 compound. I think if you maybe break it down. It's a  
18 little confusing.  
19 MR. TATUM: Sure.  
20 Q. (By Mr. Tatum) The activities you just  
21 described, are those activities that the Texas League  
22 has engaged in with regard to -- generally, with  
23 regard to voter ID legislation going back to 2004?  
24 A. No.  
25 MS. KORGAONKAR: Objection. It's still

<p style="text-align: right;">46</p> <p>1 compound.</p> <p>2 MR. TATUM: Okay.</p> <p>3 MS. KORGAONKAR: I just want to make</p> <p>4 sure.</p> <p>5 MR. TATUM: Yeah.</p> <p>6 Q. (By Mr. Tatum) Okay. Mr. Green, has the</p> <p>7 Texas League conducted educational campaigns regarding</p> <p>8 voter ID legislations going back to 2004?</p> <p>9 A. Prior to the enactment of SB 14?</p> <p>10 Q. Yes.</p> <p>11 A. As relates to voter ID, no.</p> <p>12 Q. Prior to the enactment of SB 14, did the</p> <p>13 Texas League visit colleges and universities to</p> <p>14 educate students on voter ID laws? Again, prior to SB</p> <p>15 14 and going back to 2004.</p> <p>16 A. Prior, no.</p> <p>17 Q. Prior to the enactment of SB 14, did the</p> <p>18 Texas League host community forums, community events,</p> <p>19 or voter ID clinics going back to 2004?</p> <p>20 A. As it relates to SB 14, no.</p> <p>21 Q. Prior to the enactment of SB 14, did the</p> <p>22 Texas League make phone calls or send e-mail blasts</p> <p>23 regarding voter ID legislation going back to 2004?</p> <p>24 MS. KORGAONKAR: Objection. That's</p> <p>25 compound.</p>	<p style="text-align: right;">48</p> <p>1 one or two occasions on how the bill would affect</p> <p>2 student voters. That's pretty much the extent prior</p> <p>3 to the enactment of the SB 14 law --</p> <p>4 Q. Okay.</p> <p>5 A. -- that I'm aware of.</p> <p>6 Q. Can you describe the Texas League's</p> <p>7 activities related to voter ID legislation being</p> <p>8 proposed or enacted in any other state?</p> <p>9 A. Oh, I don't -- I don't recall, no.</p> <p>10 Q. You cannot describe any of those activities?</p> <p>11 A. In terms of voter ID legislation in any other</p> <p>12 state?</p> <p>13 Q. Yes.</p> <p>14 A. I can't recall. I'm really just focused on</p> <p>15 here in Texas.</p> <p>16 Q. To your knowledge, does the Texas League</p> <p>17 engage in any kind of activity with regard to voter ID</p> <p>18 legislation being proposed in any other state?</p> <p>19 A. No.</p> <p>20 Q. They do not?</p> <p>21 A. No.</p> <p>22 Q. There are other affiliates at the state level</p> <p>23 of the League of Young Voters. Correct?</p> <p>24 A. Correct.</p> <p>25 Q. Do you know where those affiliates are?</p>
<p style="text-align: right;">47</p> <p>1 Q. (By Mr. Tatum) I'm just reading it right off</p> <p>2 your previous answer here. You testified earlier that</p> <p>3 you made phone calls to universities.</p> <p>4 A. Well, we made phone calls to voters, right,</p> <p>5 not to universities.</p> <p>6 Q. Okay. Did the Texas League, prior to the</p> <p>7 enactment of SB 14, monitor polling locations on</p> <p>8 election day and during the early voting period to</p> <p>9 make sure that people were aware, before they stood in</p> <p>10 line, that they had to present some form of ID?</p> <p>11 A. No.</p> <p>12 Q. Okay. So prior to the enactment of SB 14,</p> <p>13 what kinds of activities did the Texas League engage</p> <p>14 in with regard to voter ID legislation? That's</p> <p>15 probably the question I should have asked right up</p> <p>16 front.</p> <p>17 A. Before it was actually enacted?</p> <p>18 Q. Yes, prior -- between 2004 and the enactment</p> <p>19 of SB 14, within that window of time, what kind of</p> <p>20 activities did the Texas League engage in with regard</p> <p>21 to voter ID legislations being proposed?</p> <p>22 A. Okay. Well, I know that our -- I know we</p> <p>23 participated in, you know, some coalition calls just</p> <p>24 to -- coalition calls to just get an update on the</p> <p>25 status of the bill. Our state director testified on</p>	<p style="text-align: right;">49</p> <p>1 A. We have Georgia, we have Wisconsin, and we</p> <p>2 have Maine.</p> <p>3 Q. Does the Texas League regularly interact or</p> <p>4 collaborate with those other affiliates in any way?</p> <p>5 A. Not necessarily. I mean, we host -- I mean,</p> <p>6 we do, I guess, affiliate-wide calls just to get</p> <p>7 updates and share best practices.</p> <p>8 MS. KORGAONKAR: Stephen, after this</p> <p>9 line of questioning, can we take a quick break?</p> <p>10 MR. TATUM: Oh, sure. Let me just make</p> <p>11 sure we don't have a ways to go and just find a good</p> <p>12 stopping point.</p> <p>13 MS. KORGAONKAR: Of course.</p> <p>14 Q. (By Mr. Tatum) Okay. Mr. Green, does the</p> <p>15 Texas League conduct any policy making or</p> <p>16 advocacy-related work specifically with regard to</p> <p>17 voter ID legislation?</p> <p>18 A. No.</p> <p>19 MR. TATUM: Why don't we go ahead and</p> <p>20 take a break right now?</p> <p>21 MS. KORGAONKAR: Sure.</p> <p>22 MR. TATUM: Five or ten minutes?</p> <p>23 MS. KORGAONKAR: Sounds good. I have</p> <p>24 10:57.</p> <p>25 (Break.)</p>



50

1 MR. TATUM: All right. We're back on  
2 the record.  
3 Q. (By Mr. Tatum) Mr. Green, I want to go back,  
4 backtrack just a little bit. I asked you previously  
5 about the activities of the Texas League related to  
6 voter ID legislation proposed or enacted in any other  
7 state. Was it your testimony that you're not aware of  
8 any activities that the Texas League conducts with  
9 such voter ID legislation?  
10 A. You're talking about the Texas League?  
11 Q. Yes.  
12 A. The Texas League doesn't do anything outside  
13 of Texas.  
14 Q. Okay.  
15 A. All right.  
16 Q. I just wanted to confirm. Okay. You  
17 mentioned before activities of the Texas League, such  
18 as registration, education, and assisting voters  
19 during elections. I want to ask you just a little bit  
20 more about that. Could you describe specifically what  
21 kinds of activities the Texas League engages in with  
22 regard to voter registration?  
23 A. Well, we do -- we do what we call "tabling."  
24 Q. "Tabling"?  
25 A. Tabling. And that's where we set up a table

52

1 Q. Do you educate constituents or anyone else  
2 regarding the process of voting?  
3 A. The process of voting, yes.  
4 Q. Does that include educating constituents and  
5 anyone else about the necessary steps to take to vote  
6 about polling places?  
7 A. Oh, yeah.  
8 Q. On that note, could you describe the Texas  
9 League's activities specifically with regard to  
10 assisting voters during elections?  
11 A. Well, during elections, we make phone calls  
12 to them. We tell them -- you know -- if they have a  
13 question about where their polling location is or the  
14 nearest one, we identify what that poll location is  
15 and provide that information to them.  
16 Q. And when you make phone calls, where do you  
17 get the phone numbers?  
18 A. To make phone calls?  
19 Q. Yes.  
20 A. Through a -- through a system we have called  
21 VAN.  
22 Q. Are those numbers included --  
23 A. VAN, Voter Action Network.  
24 Q. Are this Voter Action Network --  
25 A. And, also, our -- our constituency base, as

51

1 in a community or on a college campus to register  
2 people to vote people who are -- people to vote who  
3 haven't been registered.  
4 Q. Do you do that throughout the state?  
5 A. Yes.  
6 Q. And what kinds of resources are involved in  
7 that activity?  
8 A. Well, we have staff, staff salaries. We have  
9 print collateral.  
10 Q. Do you engage any volunteers for such  
11 activities?  
12 A. We do, uh-huh.  
13 Q. Could you describe the activities of the  
14 Texas League specifically with regard to voter  
15 education?  
16 A. Voter education is really particularly print  
17 materials about the process of voting, educating them  
18 on, you know, why -- why they vote. And, you know, it  
19 ties back into the -- you know -- the community forums  
20 and, you know, the different events to just educate  
21 about voting and why it's important.  
22 Q. Do you educate constituents or anyone else  
23 regarding voter laws, in general?  
24 A. About voter laws in general? Not  
25 necessarily.

53

1 well.  
2 Q. What is the Voter Action Network?  
3 A. It's a -- just a list of registered voters  
4 that's obtained from the Secretary of State's office.  
5 It's just a database.  
6 Q. Is that database maintained by the Secretary  
7 of State?  
8 A. No. It's actually -- it's actually  
9 maintained by a -- the organization that actually --  
10 that actually, I guess, created the database, uh-huh.  
11 Q. And what organization is that?  
12 A. State Voices.  
13 Q. I'm sorry?  
14 A. State Voices. State Voices, uh-huh.  
15 Q. Is that an independent organization or is  
16 that part of some other organization?  
17 MS. KORGAONKAR: Objection. Calls for  
18 speculation and beyond the notice.  
19 A. Yeah, I don't -- I don't know. I mean, I  
20 don't know if they are an independent or --  
21 Q. (By Mr. Tatum) Okay. Could you describe the  
22 activities of the Texas League specifically with  
23 regard to SB 14?  
24 A. Well, I mean, aside from the, you know, our  
25 state director making testimonies, you know, about --

54

1 about the law and how it impacts young people. You  
 2 know, once it was enacted, we did do comment letter  
 3 that we submitted to the Department of Justice citing  
 4 our reason on why this law is a burden to our  
 5 constituency base. And that's pretty much it.  
 6 Q. With regard to SB 14, is there anything the  
 7 Texas League does besides issuing a comment letter?  
 8 A. As it relates to SB 14?  
 9 Q. Yes.  
 10 A. I mean, as I said before, I mean, we've  
 11 educated -- you know -- our constituents about -- you  
 12 know -- about the law -- you know -- once it passed on  
 13 what's required to go to the polls and vote.  
 14 Q. And what kinds of resources have been devoted  
 15 to SB 14-related activities?  
 16 A. I mean, a lot of our resources have been  
 17 shifted to -- you know -- with -- with time and -- you  
 18 know -- printing -- you know -- print collateral  
 19 and -- and -- you know -- hope -- you know -- a great  
 20 deal of stuff to educate our -- you know -- our  
 21 constituent base about the new law.  
 22 Q. Were more resources spent regarding the  
 23 education of SB 14 than were spent regarding the  
 24 education of previous voter ID bills?  
 25 A. What do you mean, "previous voter ID bills"?

56

1 Q. Okay.  
 2 (Exhibit No. 4 marked.)  
 3 Q. Mr. Green, I'm handing you what's been marked  
 4 as Exhibit 4.  
 5 A. Uh-huh.  
 6 MR. TATUM: I'm sorry I didn't bring  
 7 more.  
 8 MS. CONLEY: Oh, that's okay. No  
 9 worries.  
 10 Q. Mr. Green, I represent to you that this  
 11 document was produced to Defendants in this  
 12 litigation. Do you recognize these documents?  
 13 A. Yes.  
 14 Q. And what do these documents represent?  
 15 A. About an upcoming coalition meeting that we  
 16 are part of, uh-huh.  
 17 Q. A coalition that the Texas League is a part  
 18 of?  
 19 A. Correct, uh-huh.  
 20 Q. What is the name of that coalition?  
 21 A. Well, it's part of the Got ID campaign or the  
 22 got ID Coalition.  
 23 Q. So the coalition is the result of the Got ID  
 24 campaign that you mentioned earlier?  
 25 A. Correct.

55

1 Q. Any voter ID legislation that was proposed or  
 2 enacted prior to SB 14.  
 3 A. Uh-huh.  
 4 Q. I think you mentioned earlier that the Texas  
 5 League sought to educate its constituents and members  
 6 regarding those bills. Is that correct?  
 7 A. Prior -- prior to the passing of SB 14?  
 8 MS. KORGAONKAR: I'd just object. He's  
 9 testified that the League didn't exist before 2010.  
 10 THE WITNESS: Yeah.  
 11 MR. TATUM: Okay. Thank you.  
 12 Q. (By Mr. Tatum) So, since 2010, has the Texas  
 13 League spent any amount of resources on educating its  
 14 constituents regarding voter ID legislation, other  
 15 than SB 14?  
 16 A. No.  
 17 Q. No?  
 18 A. No.  
 19 Q. So is it correct to say that the resources  
 20 the Texas League has spent on educating its members  
 21 regarding SB 14 -- sorry. Let me retract.  
 22 Is SB 14 the first voter ID bill that the  
 23 Texas League has spent resources towards educating its  
 24 members on?  
 25 A. Yes.

57

1 Q. And was that coalition created in direct  
 2 response to SB 14?  
 3 A. Right, it was created to, basically, educate  
 4 our populations about the new voter ID law, uh-huh.  
 5 MS. KORGAONKAR: And, Stephen, I don't  
 6 want to interrupt your line of questioning, but I just  
 7 want to note for the records that it's two pages here,  
 8 but they don't appear to be consecutive --  
 9 MR. TATUM: Okay.  
 10 MS. KORGAONKAR: -- based on the Bates  
 11 stamp and don't appear to be one document.  
 12 THE WITNESS: Right.  
 13 MR. TATUM: That's correct. If you'd  
 14 like, I can mark them as separate exhibits.  
 15 MS. KORGAONKAR: I just wanted to note  
 16 that for the record.  
 17 MR. TATUM: Okay.  
 18 Q. (By Mr. Tatum) So, Mr. Green, you stated  
 19 that this e-mail describes an upcoming meeting. Is  
 20 that correct?  
 21 A. That's correct.  
 22 Q. And is that the meeting described in the  
 23 e-mail here as occurring on Monday, October 7, 2013 at  
 24 the TOP headquarters?  
 25 A. That's correct.



<p style="text-align: right;">58</p> <p>1 Q. What is the "TOP"?</p> <p>2 A. It's one of the collaborating organizations</p> <p>3 called the Texas Organizing Project.</p> <p>4 Q. Is that an independent organization?</p> <p>5 MS. KORGAONKAR: Objection. Beyond the</p> <p>6 scope of the notice and it calls for speculation. You</p> <p>7 can answer.</p> <p>8 A. I don't know if it's independent or not.</p> <p>9 Q. (By Mr. Tatum) So what do you know about the</p> <p>10 TOP?</p> <p>11 A. I know, to my knowledge, that the Texas</p> <p>12 Organizing project, to my knowledge, do similar work</p> <p>13 that we do.</p> <p>14 Q. Did you attend this meeting?</p> <p>15 A. On October 7th, I believe so.</p> <p>16 Q. And do you remember what was discussed at</p> <p>17 that meeting?</p> <p>18 A. Pretty much -- if I can recall, pretty much</p> <p>19 just looking at ways in which we could, you know,</p> <p>20 develop materials and messaging on how -- you know --</p> <p>21 just how to outreach to our target bases about the</p> <p>22 voter ID law and what's required to vote at the polls.</p> <p>23 Q. Was this litigation discussed at that</p> <p>24 meeting?</p> <p>25 A. Litigation, no, I don't -- I don't think so.</p>	<p style="text-align: right;">60</p> <p>1 Q. Is that the only such workshop that has been</p> <p>2 held by the coalition, to your knowledge?</p> <p>3 A. In terms of workshop, no. There's been --</p> <p>4 there's been -- there's been others. There's been --</p> <p>5 I know there was a voter ID clinic, as well as a --</p> <p>6 there's a community education forum, as well.</p> <p>7 Q. And were these other clinics and forums that</p> <p>8 you're referring to, were those directly related to</p> <p>9 SB 14?</p> <p>10 A. They were relating to educating about the new</p> <p>11 law and what's required to vote.</p> <p>12 Q. Were any such workshops or clinics held by</p> <p>13 the coalition prior to the enactment of SB 14?</p> <p>14 A. No.</p> <p>15 Q. Sorry. I forgot to ask. The TOP</p> <p>16 headquarters, do you remember where that was?</p> <p>17 A. It was here in Houston, uh-huh.</p> <p>18 Q. You mentioned this earlier, I just want to</p> <p>19 confirm, has the Texas League conducted any kind of</p> <p>20 studies or reports, audits, estimates, projections or</p> <p>21 any other kind of analyses related to the effect of</p> <p>22 SB 14 on minority voters or on voters who are members</p> <p>23 of a language minority group?</p> <p>24 A. No.</p> <p>25 Q. No.</p>
<p style="text-align: right;">59</p> <p>1 Q. Turn to the next page.</p> <p>2 A. Uh-huh.</p> <p>3 Q. This next page references an October 15th</p> <p>4 voter ID community workshop. Is that correct?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. Did you attend that?</p> <p>7 A. Yes.</p> <p>8 Q. And where was that held?</p> <p>9 A. If I can recall, the -- this particular one</p> <p>10 was held at the S.H.A.P.E Community Center.</p> <p>11 Q. In what city?</p> <p>12 A. Here in Houston.</p> <p>13 Q. And was that community workshop put on by the</p> <p>14 Texas League?</p> <p>15 A. No. It was put on by the -- by the</p> <p>16 coalition.</p> <p>17 Q. By the coalition?</p> <p>18 A. Uh-huh.</p> <p>19 Q. Do you know what other organizations are a</p> <p>20 part of this coalition?</p> <p>21 A. We have -- you know -- as I said, we have the</p> <p>22 Texas Organizing Project. If I can recall, we have</p> <p>23 Mi Familia Vota. I know the NAACP has one. The</p> <p>24 Houston Area Urban League. I mean, there may be more,</p> <p>25 but I just can't recall.</p>	<p style="text-align: right;">61</p> <p>1 (Exhibit No. 5 marked.)</p> <p>2 Q. Mr. Green, I'm handing you what's been marked</p> <p>3 as Exhibit 5. Mr. Green, do you recognize this</p> <p>4 document?</p> <p>5 A. This particular document, yes.</p> <p>6 Q. You've seen this document before?</p> <p>7 A. Yes, uh-huh.</p> <p>8 Q. Mr. Green, I represent to you that this is</p> <p>9 the Amended Complaint in Intervention of</p> <p>10 Plaintiff-Intervenors The Texas League of Young Voters</p> <p>11 Education Fund, Imani Clark, Aurica Washington,</p> <p>12 Crystal Owens, and Michelle Bessiake, filed on</p> <p>13 November 14th, 2013. Is that an accurate</p> <p>14 representation of what this document is?</p> <p>15 A. Correct, uh-huh.</p> <p>16 Q. Okay. So you're aware that the Texas League</p> <p>17 intervened in this lawsuit along with Imani Clark,</p> <p>18 Aurica Washington, Crystal Owens, and Michelle</p> <p>19 Bessiake. Correct?</p> <p>20 A. Correct.</p> <p>21 Q. And what -- with regard to those four</p> <p>22 individuals that I just named, what is their</p> <p>23 respective involvement with the Texas League, if any?</p> <p>24 A. (No verbal response.)</p> <p>25 Q. And if you want, I'll just -- I can ask</p>

62

1 individually. What is the involvement of -- what is  
 2 Imani Clark's involvement with the Texas League?  
 3 MS. KORGAONKAR: Could you just clarify  
 4 what you mean by "involvement"?  
 5 A. Involvement, uh-huh.  
 6 Q. (By Mr. Tatum) Sure. We've established or  
 7 you've acknowledged that the Texas League intervened  
 8 in this lawsuit along with those four individuals.  
 9 Correct?  
 10 A. (No verbal response.)  
 11 Q. Their names appear on the same intervening  
 12 documents. Is that correct?  
 13 A. That's what I see, uh-huh.  
 14 Q. Okay. Is Imani Clark a constituent of the  
 15 Texas League?  
 16 A. I don't -- I'm not -- I'm not sure. I'm not  
 17 -- I don't -- I don't recall if -- I mean, I don't  
 18 recall at the moment if she is or if she isn't.  
 19 Q. Do you know if Imani Clark has been involved  
 20 with any Texas League activity?  
 21 A. Imani Clark, I don't recall.  
 22 Q. Do you know if she's ever volunteered for the  
 23 Texas League?  
 24 A. Imani Clark, I mean, I don't recall.  
 25 Q. Do you know if Imani Clark is involved with

64

1 individuals are involved with the Texas League in any  
 2 way?  
 3 MS. KORGAONKAR: Objection. Compound  
 4 and vague.  
 5 MR. TATUM: I can ask about them  
 6 individually if you want, which I will do.  
 7 Q. (By Mr. Tatum) Are you aware if Crystal  
 8 Owens is involved with the Texas League in any way?  
 9 A. In any way, I don't -- you know -- I don't  
 10 know. I don't -- I don't recall. I mean -- and  
 11 Michelle. . .  
 12 Q. Are you aware or do you know if Michelle  
 13 Bessiake is involved with the Texas League in any way?  
 14 A. Michelle, I don't -- I don't recall this  
 15 either, huh-uh.  
 16 Q. Has the Texas League actively sought to find  
 17 constituents or anyone else to encourage them to join  
 18 this lawsuit?  
 19 MS. KORGAONKAR: Objection for  
 20 vagueness. You can answer.  
 21 MR. TATUM: Lets me rephrase.  
 22 Q. (By Mr. Tatum) Has the Texas League actively  
 23 sought to find one of its constituents or anyone else  
 24 to discuss with them the possibility of joining this  
 25 lawsuit?

63

1 the Texas League in any way?  
 2 A. I mean, not to my knowledge.  
 3 Q. Do you know if Aurica Washington is involved  
 4 with the Texas League in any way?  
 5 MS. KORGAONKAR: I just want to clarify  
 6 for the record that Aurica Washington is no longer a  
 7 Plaintiff-Intervenor in this case.  
 8 A. Okay. I mean, to the extent of my knowledge,  
 9 I don't -- I don't know.  
 10 Q. (By Mr. Tatum) You don't know if Aurica  
 11 Washington is involved with the Texas League in any  
 12 way?  
 13 A. I mean, to the extent of my knowledge, I  
 14 don't -- I don't know, no.  
 15 Q. Have you ever seen that name before?  
 16 A. I've seen all the names.  
 17 Q. Have you seen any of those names before you  
 18 just now saw them on this complaint?  
 19 A. Yes, uh-huh.  
 20 Q. And when did you last see those names?  
 21 A. I believe it was on another document that was  
 22 similar to this. Maybe a -- maybe another complaint  
 23 document, because this is the amended one.  
 24 Q. Okay. So with regard to any of those four  
 25 individuals, do you know if any of those four

65

1 A. Actively sought, no. But in the course of  
 2 our work, we did come across -- or members of our  
 3 organization did come across some people who may have  
 4 been impacted about the law and the option was  
 5 presented to them, you know, that a lawsuit was filed,  
 6 uh-huh. Well, that -- that -- you know -- for them to  
 7 -- or for them or to be a part of our lawsuit, uh-huh.  
 8 Q. So is it your testimony now that the Texas  
 9 League was approached by one or more of its  
 10 constituents or anyone else that it serves about the  
 11 possibility of joining this lawsuit?  
 12 MS. KORGAONKAR: Objection. That  
 13 mischaracterizes his prior testimony.  
 14 Q. (By Mr. Tatum) Is that an accurate summary  
 15 of your testimony?  
 16 A. What do you mean by "approach"?  
 17 Q. You testified a minute ago, and I'm reading  
 18 from the transcript here, We did come across members  
 19 of our organization who may have been impacted about  
 20 the law and the option was presented to them that a  
 21 lawsuit was filed. Is that correct?  
 22 A. That's correct, uh-huh.  
 23 Q. Okay. So is it your testimony then that the  
 24 Texas League did not actively seek to find  
 25 constituents at the Texas League to discuss with them

<p style="text-align: right;">66</p> <p>1 the possibility of joining this lawsuit?</p> <p>2 A. I mean, I wouldn't say we -- I mean, we</p> <p>3 didn't actively seek. No, we didn't actively seek.</p> <p>4 But, you know, as I said before, we did -- I mean --</p> <p>5 you know -- some of them, we -- you know -- we did</p> <p>6 present with the opportunity. But for them to</p> <p>7 actually join the lawsuit, that was -- you know --</p> <p>8 that's pretty much their decision, but we didn't</p> <p>9 actively seek, no.</p> <p>10 Q. Did you meet with any of these -- and you</p> <p>11 mentioned members of your organization. By that, I</p> <p>12 assume you mean constituents. Correct?</p> <p>13 A. When I say members, I mean staff. Well, I</p> <p>14 meant staff.</p> <p>15 Q. So you meant to say that you came across</p> <p>16 staff of the Texas League who came to you to say that</p> <p>17 they've been impacted by the law and you presented</p> <p>18 staff with the possibility of joining this lawsuit?</p> <p>19 A. Wait. Go back. Now, I'm confused.</p> <p>20 Q. Okay. I'm trying to -- we need to clarify</p> <p>21 this.</p> <p>22 A. Right.</p> <p>23 Q. You testified earlier, you said, We did come</p> <p>24 across members of our organization who may have been</p> <p>25 impacted about the law and the option was presented to</p>	<p style="text-align: right;">68</p> <p>1 I mean, I don't know if she was contacted by any of</p> <p>2 our constituents -- well, our constituents.</p> <p>3 Q. How do you know that your constituents -- let</p> <p>4 me rephrase. How do you know that the Texas League</p> <p>5 came across these constituents who said they have been</p> <p>6 impacted by the voter ID law?</p> <p>7 A. I mean, as I said before, in the course of</p> <p>8 our work -- I mean, in the course of our work -- I</p> <p>9 mean, like I say, I don't know who from the</p> <p>10 organization, but I know that someone may have</p> <p>11 mentioned this to them, that the opportunity is</p> <p>12 available to join a lawsuit.</p> <p>13 Q. Do you know who that someone was?</p> <p>14 A. I mean, I don't recall exactly who, no.</p> <p>15 Q. Do you know if any of these constituents that</p> <p>16 you came across in the course of your work, do you</p> <p>17 know if any of those constituents included the four</p> <p>18 individuals who are listed on the amended complaint?</p> <p>19 A. I mean, it's a possibility, but I don't know</p> <p>20 for sure.</p> <p>21 Q. If you'll look at the Amended Complaint that</p> <p>22 I've handed you there.</p> <p>23 A. (Complying.)</p> <p>24 Q. I'll represent to you --</p> <p>25 MR. TATUM: And, Natasha, please correct</p>
<p style="text-align: right;">67</p> <p>1 them about the lawsuit. Correct?</p> <p>2 A. I believe I said, in the course of our work,</p> <p>3 we came across -- I mean, I may have mentioned</p> <p>4 members, but constituent -- constituency base or</p> <p>5 people who we outreach to.</p> <p>6 Q. All right. So when you said members, you</p> <p>7 meant to say constituents, because we've established</p> <p>8 that you don't have members?</p> <p>9 A. Right, correct.</p> <p>10 Q. Okay. Did you meet with any of these</p> <p>11 constituents that you referred to here? Did you</p> <p>12 personally meet with them?</p> <p>13 A. Did I personally meet with them, no.</p> <p>14 Q. Do you know who within the Texas League met</p> <p>15 with these specific constituents?</p> <p>16 A. I don't recall exactly who.</p> <p>17 Q. You mentioned Arianna Williams earlier. What</p> <p>18 is her job with the Texas League?</p> <p>19 A. Well, I mean, she assists with our programs,</p> <p>20 particularly voter registration and voter -- voter</p> <p>21 engagement -- I mean, voter education.</p> <p>22 Q. Do you know if she was contacted by any</p> <p>23 constituent about the possibility of joining this</p> <p>24 lawsuit?</p> <p>25 A. I mean, I don't know personally. I don't --</p>	<p style="text-align: right;">69</p> <p>1 me if I'm wrong.</p> <p>2 Q. (By Mr. Tatum) -- that the Complaint alleges</p> <p>3 that each one of the four individuals, Ms. Clark,</p> <p>4 Ms. Washington, Ms. Owens, and Ms. Bessiake is and</p> <p>5 will continue to be harmed by the voting laws enacted</p> <p>6 by SB 14?</p> <p>7 MS. KORGAONKAR: And I just want to</p> <p>8 clarify that Ms. Washing, Ms. Owens, and Ms. Bessiake</p> <p>9 are no longer parties in this litigation.</p> <p>10 Q. (By Mr. Tatum) Okay. Mr. Green, do you know</p> <p>11 -- do you have any idea why Ms. Washington, Ms. Owens,</p> <p>12 or Ms. Bessiake are no longer parties to this</p> <p>13 litigation?</p> <p>14 MS. KORGAONKAR: And Blake, I'll just</p> <p>15 caution you that you can answer the yes for no</p> <p>16 question, but not to reveal the contents of any</p> <p>17 conversations that you may have had with counsel --</p> <p>18 THE WITNESS: Okay.</p> <p>19 MS. KORGAONKAR: -- about the</p> <p>20 litigation.</p> <p>21 A. Right. I mean, I don't recall exactly why</p> <p>22 they are no longer on the case.</p> <p>23 Q. (By Mr. Tatum) Have you ever interacted with</p> <p>24 Ms. Washington, Ms. Owens, or Ms. Bessiake?</p> <p>25 A. No.</p>

70

1 Q. Okay. Okay. So then I'll represent to you  
2 that the complaint alleges that Ms. Clark, who is  
3 still a party to this litigation, is and will continue  
4 to be harmed by the voting laws enacted by SB 14. Is  
5 that a correct representation of the Complaint? In  
6 fact, before you answer that, let me just find it and  
7 point it out for you.

8 MS. CONLEY: I'm sorry. I don't think I  
9 understood the question. Can you -- do you mind  
10 repeating it?

11 MR. TATUM: Actually, I hadn't gotten to  
12 the question yet. I was --

13 MS. CONLEY: Or --

14 MR. TATUM: I'll start over.

15 MS. CONLEY: Yeah.

16 MR. TATUM: Let's re-rack.

17 MS. CONLEY: Thank you.

18 Q. (By Mr. Tatum) Okay. On Page 4 of that  
19 Complaint that you have in front of you, at the top of  
20 the page, Paragraph 12, the Complaint alleges that  
21 Ms. Clark, Ms. Imani Clark's voting rights are impeded  
22 by SB 14, as she will be prevented from voting in  
23 person at the polls because of Defendants'  
24 unnecessarily strict and racially discriminatory photo  
25 identification law.

72

1 ID under SB 14?

2 A. Yes.

3 Q. And what is that contention based on?

4 A. Well, I mean, it's based on, you know, social  
5 and economic status. When you think about it, across  
6 the board, African Americans and Hispanics are, you  
7 know, disproportionately not able to, you know, have  
8 the funds, you know, compared to, you know, white  
9 people across the board to be able to afford the  
10 requiring documents, especially those that are  
11 underlying, to actually get an EIC. And  
12 specifically -- you know -- you know -- student IDs.  
13 I mean, specifically, those out-of-state students that  
14 don't have one of the forms of ID, like they had  
15 before, which was a student ID, to vote.

16 Q. Do you know what the current acceptable forms  
17 of ID to vote are under SB 14?

18 A. I do.

19 Q. Can you list them?

20 A. Sure. You have your Texas Driver's License,  
21 your Texas ID, you have a military ID, you have a U.S.  
22 citizenship certificate with a photo, you have a U.S.  
23 passport, you have a concealed handgun license, and  
24 then you have your Election Identification  
25 Certificate.

71

1 Is that an accurate reading of that  
2 allegation?

3 A. Correct.

4 Q. Okay. Do you know if the Texas League has  
5 ever assisted Mrs. Clark or tried to assist Mrs. Clark  
6 with registering to vote?

7 A. I don't recall.

8 Q. Do you know if the Texas League has ever  
9 assisted or attempted to assist Mrs. Clark with regard  
10 to obtaining an acceptable form of ID under SB 14?

11 A. I don't recall.

12 Q. Does the Texas League -- let me back up.

13 Has the Texas League ever assisted or  
14 attempted to assist any of its constituents in  
15 obtaining an acceptable form of ID under SB 14?

16 A. I mean, yes. Yes. We've -- I mean, we've --  
17 you know -- we've -- we've -- you know -- like I said,  
18 we have a lot of print material where we educated them  
19 on how to go about getting an -- getting an EIC. And  
20 I know on -- like I said, on one or two occasions, we  
21 did take them to -- to -- you know -- a local mobile  
22 DPS office to get an EIC.

23 Q. Does the Texas League contend that SB 14  
24 creates a burden for black and other voters of color  
25 because those voters do not have an acceptable form of

73

1 Q. Also known as the "EIC"?

2 A. EIC, correct.

3 Q. Okay. Now, is the contention you were just  
4 discussing, is that based on any kind of study or  
5 analyses?

6 MS. KORGAONKAR: And I'll just object to  
7 the extent that "contention" is a legal term and  
8 Mr. Green is not a lawyer.

9 A. Can you rephrase the question?

10 Q. (By Mr. Tatum) Sure.

11 A. Uh-huh.

12 Q. Well, let me back up if we're not going to --  
13 if we don't like the use of the word "contention."  
14 Does the Texas League -- does the Texas League believe  
15 that SB 14 creates a burden for black and other voters  
16 of colors because those voters do not have an  
17 acceptable form of ID under SB 14?

18 A. Yes.

19 Q. Okay. And you previously described the basis  
20 for that belief. Correct?

21 A. Correct.

22 Q. Okay. Is that belief based on any kind of  
23 formal study or analyses?

24 A. I mean, I've read -- I mean, I've read  
25 articles and, you know, papers and, you know, iPads

74

1 that talk about how, you know, the law has been a  
 2 burden. And just from people that we've talked to in  
 3 the field, you know, how it -- it -- you know -- it's  
 4 a burden to particularly African Americans and  
 5 Hispanics who don't have -- you know -- you know --  
 6 generally the money and the resources to get one of  
 7 the acceptable forms of ID under this law.  
 8 Q. Does the Texas League believe that SB 14  
 9 amounts to a poll tax?  
 10 A. Yes.  
 11 Q. And what is that belief based on?  
 12 A. I mean, it's pretty much based on that the  
 13 EIC generally isn't -- I mean, isn't a free -- you  
 14 know -- free -- you know -- a free document. You  
 15 know, for instance, you know, if you're out-of-state  
 16 student, number one, you have to -- you know -- go --  
 17 you know -- go get your -- you know -- pay for a birth  
 18 certificate, which is one of the forms of ID that's  
 19 required to prove your citizenship to actually get an  
 20 ID. So you actually have to pay for that, which in  
 21 some instances are \$22 or more in order to get your  
 22 EIC. So, I mean, it can be argued that, you know,  
 23 getting an EIC or essentially even having -- you  
 24 know -- being eligible to use your eligibility to vote  
 25 can be referred to as a poll tax.

76

1 Q. Yes.  
 2 A. Lacks a significant?  
 3 MS. CONLEY: I'm sorry. Can you repeat  
 4 the question. I don't think he understood it.  
 5 MR. TATUM: Sure.  
 6 Q. (By Mr. Tatum) Does the Texas League believe  
 7 that a significant portion of its constituency lacks  
 8 any of the acceptable forms of ID under SB 14?  
 9 A. I mean, I don't know -- I mean, I don't know  
 10 about the, you know, significant. But I know that the  
 11 people that we talk to and that who we serve -- and  
 12 like I said, particularly those who are out-of-state  
 13 students here on college campuses here in Texas who  
 14 don't have a Texas ID or one of the forms of ID, that  
 15 it -- that it affects them greatly.  
 16 For example, you know, in our meetings, you  
 17 know, some of the student organization meetings that  
 18 we go to -- one of them could be the California Club.  
 19 And we all know those students who are part of the  
 20 California Club are from California and don't have a  
 21 Texas ID or Texas Driver's License.  
 22 So that's a large -- well, the majority of  
 23 all those students most likely wouldn't have the form  
 24 of ID, with the exception to, you know, their student  
 25 ID and their out-of-state ID.

75

1 Q. Does the Texas League believe that SB 14  
 2 denies or abridges the right to vote on account of  
 3 race or membership in a language minority group?  
 4 A. On account of race?  
 5 Q. Race or membership in a language minority  
 6 group.  
 7 A. Yes.  
 8 Q. And what is that belief based on?  
 9 A. I mean -- I mean, as I said before, I mean,  
 10 I've been in this work for -- for -- I mean, for quite  
 11 some time. And, I mean, it's -- you know -- it's --  
 12 it's -- it's discriminatory. And I've said before,  
 13 you know, African Americans and Hispanics and, you  
 14 know, different minority groups -- you know -- you  
 15 know -- are disproportionately affected because of the  
 16 fact that, you know, they don't have the economic, you  
 17 know, resources to be able to fulfill the requirements  
 18 to get an EIC. And that pretty much puts a burden on  
 19 the populations we serve, which are, you know,  
 20 minority communities, particularly African Americans  
 21 and Hispanics.  
 22 Q. Does the Texas League believe that a  
 23 significant portion of its constituents lack any of  
 24 the acceptable forms of ID under SB 14?  
 25 A. That are constituency?

77

1 Q. Can you identify one person who does not have  
 2 any of the acceptable forms of ID under SB 14?  
 3 A. Can I identify one person?  
 4 Q. Yes.  
 5 A. Well, Imani Clark.  
 6 Q. And she's a party to this lawsuit?  
 7 A. Uh-huh.  
 8 Q. Is there anyone else you can identify besides  
 9 Imani Clark?  
 10 A. I mean, I don't know by names, I mean,  
 11 specifically, but, I mean, I do know that there are,  
 12 like I said, people within the California Club that  
 13 don't have it. I mean, I don't know them by name, but  
 14 I do know there is the a large segment, such as that  
 15 group, that don't have the proper -- proper  
 16 identification.  
 17 Q. Is Imani Clark part of the California Club  
 18 that you just mentioned?  
 19 A. I don't think so, huh-uh.  
 20 Q. Do you know how many of your -- do you know  
 21 how many Texas League constituents lack a driver's  
 22 license?  
 23 A. I don't --  
 24 Q. A Texas Driver's License?  
 25 A. Oh, I don't know that information.



78

1 Q. Do you know how many Texas League  
2 constituents lack a Texas-issued photo ID?  
3 A. A Texas-issued photo ID? I don't have that  
4 number. I don't know.  
5 Q. Do you know how many Texas League  
6 constituents lack a concealed handgun license?  
7 A. Lack a concealed handgun license?  
8 Q. Yes.  
9 A. I don't know.  
10 Q. Do you know how many Texas League  
11 constituents do not have a passport?  
12 A. I don't know.  
13 Q. Do you know how many Texas League  
14 constituents do not have a military ID card with a  
15 photo on it?  
16 A. Military ID? How many, I don't know.  
17 Q. Do you know how many Texas League  
18 constituents do not have a citizenship certificate?  
19 A. I don't know.  
20 Q. Do you know how many Texas League  
21 constituents do not have the necessary documents to  
22 get an EIC?  
23 A. I don't know.  
24 Q. Do you know how many Texas League  
25 constituents have attempted to obtain an EIC?

80

1 A. That's correct.  
2 Q. Do you know if they were successful in  
3 obtaining an EIC on that trip?  
4 A. Oh, I don't know, no.  
5 Q. Would she -- would Arianna Williams know?  
6 A. Oh, I don't know. I mean, but let's -- let's  
7 just say, as an organization, we made several attempts  
8 just through our education to make sure that, you  
9 know, our constituency base and those in our target,  
10 you know, audience know about the steps on how to get  
11 an EIC. Now, some of those may have actually received  
12 an EIC. Some of them probably didn't, but we don't  
13 know. But I know we, as an organization, made every  
14 attempt to educate them about, you know, if they don't  
15 have one of the seven forms of ID, that they -- that  
16 they are educated on how to get that.  
17 Q. Has the Texas League followed up with any  
18 constituent that it's educated about getting an EIC to  
19 determine whether or not they were successful in  
20 getting one?  
21 A. Have we followed? I don't -- I don't recall.  
22 I don't believe so.  
23 (Exhibit No. 6 marked.)  
24 Q. Mr. Green, I'm handing you what's been marked  
25 as Exhibit 6. Mr. Green, I represent to you that this

79

1 A. I don't have that number, as well. Attempted  
2 to?  
3 Q. Yes.  
4 A. I don't -- I don't know that number, no.  
5 Q. Can you identify any constituent of the Texas  
6 League that has attempted to obtain an EIC?  
7 A. I mean, as I -- you know -- as I can recall,  
8 you know, when our staff member, took, you know, on  
9 those occasions two or three of our constituencies to  
10 go get an EIC. That was an attempt.  
11 Q. Do you recall what staff member took them?  
12 A. I can recall Arianna Williams, uh-huh.  
13 Q. Do you know where she took them to attempt to  
14 obtain an EIC?  
15 A. Where? I believe, to the Department of  
16 Public Safety, to the DPS office.  
17 Q. And you said she took three people?  
18 MS. KORGAONKAR: Objection. I don't  
19 think that that was his testimony.  
20 A. Right.  
21 Q. (By Mr. Tatum) Let me check. I believe you  
22 said two or three constituents. It's kind of rough  
23 there. Anyway, regardless, Arianna Williams took some  
24 constituents to attempt to get an EIC. Is that  
25 correct?

81

1 document has been produced to the Defendants in this  
2 litigation. Have you ever seen this document before?  
3 A. Yes.  
4 Q. What is this document?  
5 A. It's a comment letter that we submitted to  
6 the Department of Justice to deny preclearance,  
7 Section 5 preclearance, because we feel as though --  
8 because we believe that, you know, the law pretty much  
9 puts a burden on our key population.  
10 Q. So this comment letter was prepared by the  
11 Texas League. Correct?  
12 A. Correct. It was jointly prepared by Texas  
13 League and the Legal Defense Fund.  
14 Q. Okay.  
15 A. Uh-huh.  
16 Q. And it was submitted on September 8th, 2011.  
17 It that correct? Just going off the first page there.  
18 A. That's correct.  
19 Q. Okay. If you wouldn't mind turning to  
20 Page 5. Let me know when you're there.  
21 A. I'm there.  
22 Q. Okay. At the bottom of Page 5, it says, For  
23 example, in explaining the hardship that the proposed  
24 photo ID law would impose on them, Prairie View  
25 students stated. And following that sentence there's

82

1 a number of quotes. Is that correct?  
 2 A. That's correct.  
 3 Q. And in the paragraph that immediately follows  
 4 those quotes, it says, The League of Young Voters  
 5 Education Fund took statements from dozens of students  
 6 along these lines, explaining that they would be  
 7 effectively prohibited from voting by the proposed  
 8 photo ID law.  
 9 Is that a correct reading of that sentence?  
 10 A. Correct.  
 11 Q. Okay. It then says, The examples above are  
 12 only a sample of the hundreds of students at Prairie  
 13 View A&M alone who would likely be denied the  
 14 opportunity to vote as a result of the proposed photo  
 15 ID law.  
 16 Is that an accurate reading of that sentence?  
 17 A. Correct.  
 18 Q. Okay. So this comment was submitted, again,  
 19 on September 8th, 2011. Do you agree that that would  
 20 be after the legislative session when SB 14 was  
 21 enacted?  
 22 A. Correct.  
 23 Q. Can the Texas League identify anyone who made  
 24 the statements in the quoted points there that I just  
 25 pointed out? That was a horribly stated question.

84

1 A. I don't -- I don't -- I don't -- I don't know  
 2 how. I mean, I don't know specifically how. I mean,  
 3 but I know we did take -- take these statements. I do  
 4 recall that occurring.  
 5 Q. And this probably calls for speculation, but  
 6 --  
 7 A. Uh-huh.  
 8 Q. -- could it have been by the use of a survey  
 9 or a comment card or some kind of petition?  
 10 MS. CONLEY: Objection. Calls for  
 11 speculation.  
 12 MS. KORGAONKAR: Objection. Calls for  
 13 speculation, but you can answer.  
 14 A. I don't know. I don't recall. I don't know.  
 15 Q. (By Mr. Tatum) Do you know if any one who  
 16 made any of these statements was unable to vote  
 17 because of SB 14?  
 18 MS. KORGAONKAR: Objection. That will  
 19 also call for speculation, but you can answer if you  
 20 know.  
 21 A. Yeah. I wouldn't know.  
 22 Q. (By Mr. Tatum) You wouldn't know?  
 23 A. These particular people?  
 24 MS. KORGAONKAR: Objection. It stands  
 25 that it calls for speculation.

83

1 MS. CONLEY: You saved us the objection.  
 2 Q. (By Mr. Tatum) Okay. Do you see the number  
 3 of bullet points that contain quote -- quoted  
 4 statements --  
 5 A. Yes.  
 6 Q. -- next to them? Okay. Can the Texas League  
 7 identify anyone who made those statements?  
 8 MS. KORGAONKAR: Objection for  
 9 vagueness. I just don't know what you mean by  
 10 "identify." Would you clarify?  
 11 Q. (By Mr. Tatum) This document does not -- it  
 12 represents that those statements were made by an  
 13 actual Prairie View A&M students. Correct?  
 14 A. Correct.  
 15 Q. Okay. Can the Texas League identify who  
 16 those actual students are?  
 17 A. I mean, I know we -- I mean, I know we took  
 18 the statements, correct.  
 19 Q. Do you know -- sorry.  
 20 A. No. You can go.  
 21 Q. Do you know when those statements were  
 22 collected?  
 23 A. I mean, I don't recall exactly, but I would  
 24 assume it would be in 2011.  
 25 Q. Do you know how they were collected?

85

1 A. Right. I mean, I don't -- I mean, I don't --  
 2 I don't know. I don't know.  
 3 Q. (By Mr. Tatum) Do you know who would know?  
 4 A. Who would know?  
 5 Q. Yes.  
 6 A. If they voted?  
 7 Q. Yes.  
 8 A. I mean, I believe the Secretary of State  
 9 would know.  
 10 Q. Do you know if anyone at the Texas League  
 11 followed up with any of the people that made these  
 12 statements to determine whether or not they were able  
 13 to vote because of SB 14?  
 14 A. Followed up? I don't -- I don't know. I  
 15 mean, I don't know, in particular, if that occurred or  
 16 not.  
 17 MR. TATUM: Are you y'all fine with  
 18 going another 20 or so minutes before taking a break?  
 19 MS. KORGAONKAR: That's fine.  
 20 MR. TATUM: Are you okay with that?  
 21 MS. CONLEY: I'm good.  
 22 THE WITNESS: I'm good.  
 23 MR. TATUM: All right.  
 24 Q. (By Mr. Tatum) Mr. Green, can you identify  
 25 any Texas League constituent known to the Texas League



86

1 when it filed this Original Complaint on August 26,  
 2 2013, who, at that time, had been unable to vote on  
 3 account of his or her inability to obtain an  
 4 acceptable form of ID under SB 14?  
 5 MS. KORGAONKAR: Objection. It's  
 6 confusing. If you could break that down.  
 7 MR. TATUM: Sure.  
 8 Q. (By Mr. Tatum) Mr. Green, I represent to you  
 9 that the Texas League filed its Original Complaint in  
 10 this case on August 26th, 2013. Can you identify any  
 11 Texas League constituent who, on that date, had been  
 12 unable to vote on account of his or her inability to  
 13 obtain an acceptable form of ID under SB 14?  
 14 A. No.  
 15 Q. On August 26, 2013 -- sorry. Let me retract  
 16 that.  
 17 Can you identify any Texas-registered voter  
 18 who, on that date, had been unable to vote on account  
 19 of his or her inability to obtain an acceptable form  
 20 of ID under SB 14?  
 21 A. Can I identify any Texas-registered voter?  
 22 Q. Yes.  
 23 A. Not by name, no. Not by name. Not  
 24 specifically by name, but I know that there were -- I  
 25 mean, just from being out in the field, I know that

87

1 there were -- you know -- you know -- some of them  
 2 that have been identified, yes, that didn't have one  
 3 of the forms of ID to vote.  
 4 Q. But you can't identify them here today?  
 5 A. In terms of names --  
 6 MS. KORGAONKAR: Objection.  
 7 Mischaracterizes his testimony. Slow down.  
 8 Q. (By Mr. Tatum) Can you identify one of them  
 9 here today?  
 10 A. In terms of names, no.  
 11 Q. Mr. Green, I represent to you that the Texas  
 12 League filed its Amended Complaint in this case on  
 13 November 14th, 2013. Can you identify any Texas  
 14 League constituent who, at that time, had been unable  
 15 to vote on account of his or her inability to obtain  
 16 an acceptable form of ID under SB 14?  
 17 A. Texas League constituent? Constituent, I  
 18 don't -- I don't -- I don't think I could identify  
 19 any, no.  
 20 Q. Can you identify any Texas-registered voter  
 21 who, at that time, had been unable to vote on account  
 22 of his or her inability to obtain an acceptable form  
 23 of ID under SB 14?  
 24 A. And this is when we filed the Amended  
 25 Complaint?

88

1 Q. Yes.  
 2 MS. CONLEY: Can you just make sure that  
 3 you understand the question before you answer?  
 4 Because he's asking you the same question.  
 5 THE WITNESS: Uh-huh.  
 6 MS. CONLEY: I just want to make sure  
 7 you understand the question.  
 8 THE WITNESS: Uh-huh.  
 9 MS. CONLEY: So if you don't understand  
 10 the question, you should ask him for clarification.  
 11 Q. (By Mr. Tatum) And please do. And I'm happy  
 12 to --  
 13 A. Right.  
 14 Q. -- rephrase or clarify.  
 15 A. Okay. Can you rephrase it, please?  
 16 Q. Sure. The Texas League filed its Amended  
 17 Complaint in this case on November 14th, 2013.  
 18 A. Uh-huh.  
 19 Q. Can you identify any Texas-registered voter  
 20 who, on that date, had been unable to vote on account  
 21 of his or her inability to obtain an acceptable form  
 22 of ID under SB 14?  
 23 A. And this is as of?  
 24 Q. As of November 14th, 2013.  
 25 A. I just want to make sure I understand your

89

1 question. Repeat it one more time.  
 2 Q. Sure. When the Texas League filed its  
 3 Amended Complaint on November 14th, 2013 -- let me  
 4 rephrase that.  
 5 Can you identify any Texas-registered voter  
 6 who, as of November 14th, 2013, had been unable to  
 7 vote on account of his or her inability to obtain an  
 8 acceptable form of ID under SB 14?  
 9 A. Can I identify by name, no. By specific  
 10 names? Can I identify by specific names? I don't --  
 11 -- by specific names, I don't know if I -- I mean, I  
 12 don't think so.  
 13 Q. Can you identify any Texas League constituent  
 14 known to the Texas League at present that is or has  
 15 been unable to vote because of his or her inability to  
 16 obtain an acceptable form of ID under SB 14? And if  
 17 you don't understand the question, please let me know.  
 18 A. I understand that question. Constituent  
 19 base? I mean, I know there are some. But in terms of  
 20 me identifying, you know the names, I don't know the  
 21 names.  
 22 Q. Do you know how many there are?  
 23 A. I don't know how many there are, no.  
 24 Q. Can you identify any Texas-registered voter  
 25 known to the Texas League at present that is or has

90

1 been unable to vote because of his or her inability to  
 2 obtain an acceptable form of ID under SB 14?  
 3 A. I mean, I don't know by name, but I know  
 4 there are some out there.  
 5 Q. Do you know how many?  
 6 A. How many? I mean, I don't -- I mean, I don't  
 7 have an estimate right now.  
 8 Q. Can you identify a specific instance in which  
 9 a Texas League constituent attempted to obtain an  
 10 acceptable form of ID under SB 14, but was unable to?  
 11 A. A Texas League constituent?  
 12 Q. Yes.  
 13 A. Okay. Repeat the question again.  
 14 Q. Sure. Can you identify a specific instance  
 15 in which a Texas League constituent attempted to  
 16 obtain an acceptable form of ID under SB 14, but was  
 17 unable to?  
 18 A. I mean, I don't think I can recall. I mean,  
 19 I don't think I can recall any attempts made by our  
 20 constituent base -- by our constituent.  
 21 Q. Can you identify a specific instance in which  
 22 any Texas-registered voter attempted to obtain an  
 23 acceptable form of ID under SB 14, but was unable to?  
 24 A. Can you repeat the question again?  
 25 Q. Sure. Can you identify a specific instance

92

1 MS. KORGAONKAR: Yeah.  
 2 THE WITNESS: Yeah.  
 3 MS. KORGAONKAR: Do you need a break?  
 4 THE WITNESS: No. I'm good.  
 5 MS. KORGAONKAR: Okay.  
 6 MR. TATUM: I've got five or so more  
 7 questions.  
 8 MS. KORGAONKAR: Okay. Perfect.  
 9 MR. TATUM: Then we can take a break.  
 10 Q. (By Mr. Tatum) Mr. Green, does the Texas  
 11 League believe that SB 14 makes it impossible for  
 12 anyone to vote?  
 13 A. Makes it impossible?  
 14 Q. Yes.  
 15 A. Yes, uh-huh.  
 16 Q. And why does the Texas League believe that?  
 17 A. Well, I mean, if a person is registered and  
 18 don't have one of the forms of IDs, then -- then they  
 19 pretty much won't be able to vote. They won't be able  
 20 to exercise their right to vote.  
 21 Q. Can you recall any specific instance in which  
 22 SB 14 made it impossible for someone to vote?  
 23 A. I mean, I can't recall specifically any  
 24 particular instances, but -- I mean, but I know if you  
 25 don't have one of the forms of ID, you know, it's

91

1 in which a Texas-registered voter attempted to obtain  
 2 an acceptable form of ID under SB 14, but was unable  
 3 to?  
 4 A. That attempted to obtain an EIC?  
 5 Q. No. Attempted to obtain any of the  
 6 acceptable forms of ID under SB 14.  
 7 A. Attempted to, but wasn't able to?  
 8 Q. Yes.  
 9 A. That attempted to? And this is any  
 10 Texas-registered voter?  
 11 Q. Yes.  
 12 A. I mean, you know, as -- you know -- as I said  
 13 before, I know we've educated people about it, you  
 14 know, through our educational materials. Now, in  
 15 terms of, you know, if attempts were made possibly if  
 16 they got an EIC or, you know, wasn't able to vote, you  
 17 know, I don't -- I mean, I don't know that specific  
 18 information.  
 19 MS. KORGAONKAR: Are you doing okay?  
 20 THE WITNESS: Huh?  
 21 MS. KORGAONKAR: Are you doing all  
 22 right?  
 23 THE WITNESS: Huh?  
 24 MS. KORGAONKAR: Are you doing okay?  
 25 THE WITNESS: Am I doing okay?

93

1 impossible form you to vote.  
 2 Q. Since SB 14 became effective, do you know how  
 3 many election cycles we've had in the State of Texas?  
 4 A. Oh, I don't know. I mean, I don't know off  
 5 the top of my head, huh-uh.  
 6 Q. Do you think it might be two or three?  
 7 A. And this was back in -- when was it?  
 8 MS. KORGAONKAR: Please clarify what you  
 9 mean by "effective."  
 10 MR. TATUM: Sure. And that's a --  
 11 that's a good point.  
 12 Q. (By Mr. Tatum) SB 14 became effective --  
 13 completely effective on January 1st, 2012.  
 14 A. Uh-huh.  
 15 Q. There was the preclearance litigation, so I  
 16 believe it did not become fully implemented until  
 17 after that litigation. So since -- let's use that as  
 18 a time frame. Since SB 14 was implemented sometime in  
 19 the summer of 2012, I believe, do you know if --  
 20 A. Wait. You said the summer of 2012. I don't  
 21 think it was -- I don't think it was implemented in  
 22 the summer of 2012.  
 23 Q. Do you know when it was implemented?  
 24 A. I mean, I know it wasn't implemented for the  
 25 Presidential election that occurred in 2012. Well,

94

1 when it went into effect?  
 2 Q. Okay. Let me just --  
 3 A. Uh-huh.  
 4 Q. Let's back up.  
 5 A. Right.  
 6 Q. Okay. Since SB 14 was implemented, do you  
 7 know if more or less of Texas League constituents  
 8 voted in any election after SB 14 was implemented as  
 9 compared to elections prior to the implementation of  
 10 SB 14? And I can rephrase that if you want.  
 11 MS. KORGAONKAR: In addition, to, I  
 12 think, need to go rephrase it, I just want to clarify.  
 13 What I think you're asking about is topic 24. And in  
 14 our objections, we've noted that the League doesn't  
 15 keep the kind of information that I think your  
 16 question is seeking. And I also want to clarify that  
 17 it's still not clear to me what you mean by  
 18 "implemented."  
 19 MR. TATUM: The way I understand topic  
 20 24 is, it talks about the number of voters who are  
 21 your members. And y'all have made it clear that the  
 22 Texas League is not a membership organization. And  
 23 I'm asking about constituents.  
 24 MS. KORGAONKAR: So I understand the  
 25 distinction.

96

1 A. Okay.  
 2 Q. Can you identify a Texas League constituent  
 3 who has suffered harm at any point because of SB 14?  
 4 MS. KORGAONKAR: Objection for  
 5 vagueness, harm.  
 6 Q. (By Mr. Tatum) Can you identify a Texas  
 7 League constituent who has been negatively impact in  
 8 any way because of SB 14?  
 9 A. What do you mean by "negatively impacted"?  
 10 Q. Any Texas League constituent who has been  
 11 affective -- affect -- affected -- sorry. Let me  
 12 re-rack.  
 13 Can you identify any Texas League constituent  
 14 who has been affected in a negative way, any kind of  
 15 negative way by SB 14?  
 16 A. Well, I mean, I can't identify by name, but I  
 17 know that there -- that there are some on our list  
 18 that -- particularly out-of-state students that don't  
 19 have one of the forms of ID, uh-huh.  
 20 Q. Do you know how many?  
 21 A. I don't know how many.  
 22 MR. TATUM: I think we can take a break.  
 23 THE WITNESS: Okay.  
 24 (Lunch recess.)  
 25 MR. TATUM: Are we back on the record?

95

1 MR. TATUM: Yes.  
 2 MS. KORGAONKAR: I think that our  
 3 objections, though, note that the League doesn't keep  
 4 any of that type of information.  
 5 MR. TATUM: Okay.  
 6 MS. KORGAONKAR: Just full stop.  
 7 MR. TATUM: Okay.  
 8 Q. (By Mr. Tatum) Just in light of that, can  
 9 you confirm, Mr. Green, that the Texas League does not  
 10 keep any kind of information relative to topic 24 in  
 11 the notice of this deposition?  
 12 A. That's correct.  
 13 MS. CONLEY: And why don't you take a  
 14 look at --  
 15 THE WITNESS: Right.  
 16 MS. CONLEY: -- topic 24 and read it  
 17 before you answer that question.  
 18 A. Right, we don't keep information on if they  
 19 vote or not.  
 20 Q. (By Mr. Tatum) Okay. Just to confirm, the  
 21 Texas League does not keep any kind of information  
 22 indicating whether or not its constituents have voted?  
 23 A. Correct.  
 24 Q. Okay. And the last question before we take a  
 25 break.

97

1 THE REPORTER: Yes.  
 2 MR. TATUM: Okay.  
 3 Q. (By Mr. Tatum) Mr. Green, I'd like to talk  
 4 to you more about SB 14. Does the Texas League  
 5 contend that SB 14 was enacted with a discriminatory  
 6 purpose?  
 7 A. Yes.  
 8 MS. KORGAONKAR: Object to "contend."  
 9 Calls for a legal conclusion.  
 10 Q. (By Mr. Tatum) Let me rephrase then. Does  
 11 the Texas League believe that SB 14 was enacted with a  
 12 discriminatory purpose?  
 13 A. Yes, uh-huh.  
 14 Q. And what is that belief based on?  
 15 A. It was -- it's based on it being  
 16 discriminatory to the fact that it -- it limits the  
 17 forms of ID to -- and -- and makes it harder for, you  
 18 know, specific burdens to -- I mean, and makes it a  
 19 burden for specific -- specific population. So some  
 20 populations are, in fact, discriminated from. . .  
 21 Q. Okay. Does the Texas League believe that the  
 22 legislature that enacted SB 14 acted outside of normal  
 23 procedures in enacting SB 14?  
 24 A. I want to make sure I understand your  
 25 question correctly. Can you restate it or rephrase it

98

1 another way?  
 2 Q. Sure. Does the Texas League believe that the  
 3 legislature -- the Texas legislature acted outside of  
 4 normal legislative procedures when it enacted SB 14?  
 5 A. Yes.  
 6 Q. And what is that belief based on?  
 7 A. Well, I mean, it's based on, you know, it  
 8 going before the DOJ and the DOJ stopping it. And  
 9 then after the -- you know -- after the Shelby County  
 10 -- I mean, not the Shelby County. But after the  
 11 Section 5 Federal Court struck it down, the -- you  
 12 know -- the state or the legislators still went ahead  
 13 and moved forward and implemented of the law.  
 14 Q. I believe you're talking more about after the  
 15 law was actually enacted.  
 16 A. Uh-huh.  
 17 Q. And I'm talking -- what I'm asking about is  
 18 the 2011 legislature.  
 19 A. Okay.  
 20 Q. Perhaps I should have been more clear about  
 21 that.  
 22 A. Okay.  
 23 Q. So during the 2011 Texas Legislature, when SB  
 24 14 was proposed, considered, and ultimately passed,  
 25 does the Texas League believe that the legislature

100

1 question, so he can know the context of --  
 2 MR. TATUM: Sure.  
 3 MS. KORGAONKAR: Read it --  
 4 MS. CONLEY: -- the -- you know -- the  
 5 Section 10 that you're referring to.  
 6 MS. KORGAONKAR: -- if that helps you to  
 7 answer the question.  
 8 MR. TATUM: Gotcha.  
 9 MS. CONLEY: Okay.  
 10 MR. TATUM: No problem.  
 11 Q. (By Mr. Tatum) So, again, I'm looking on  
 12 Page 22. And in the middle of that page there's a  
 13 numbered paragraph. It's No. 10. Do you see that  
 14 paragraph?  
 15 A. Uh-huh.  
 16 Q. Would you please say "yes"?  
 17 A. Oh, I'm sorry. Yes.  
 18 Q. Thank you. That paragraph says, Evidence  
 19 demonstrating that the Texas Legislature departed from  
 20 its usual procedures when it passed SB 14.  
 21 Is that an accurate reading of that sentence?  
 22 A. (No verbal response.)  
 23 MS. CONLEY: I'm sorry. What was the --  
 24 was the question just was -- is that an accurate  
 25 reading?

99

1 acted outside of normal legislative procedures in  
 2 pushing that bill through?  
 3 MS. KORGAONKAR: Maybe if you could  
 4 clarify "normal legislative procedures."  
 5 MR. TATUM: Sure.  
 6 Q. (By Mr. Tatum) I'm sorry. Bear with me.  
 7 Okay. In your -- in the Amended Complaint filed by  
 8 the Texas League on Page 22 -- and this is under Claim  
 9 No. 1. I'm looking at Page 22, Paragraph 10. It  
 10 cites evidence -- and I'm quoting directly from the  
 11 Amended Complaint here. It cites evidence  
 12 demonstrating that the Texas legislature departed from  
 13 its usual procedures when it passed SB 14. So that's  
 14 where this question comes from.  
 15 And when I say "legislative procedures," I'm  
 16 talking about any kind of legislative proceeding that  
 17 occurs during the course of a bill's consideration.  
 18 So with that stated, I'll ask the question again.  
 19 Does the Texas League believe that the legislature  
 20 acted outside of normal procedures in the enactment of  
 21 SB 14 during the 2011 Texas League's legislature?  
 22 MS. CONLEY: And I'd just like to -- can  
 23 we just point Mr. Green to the --  
 24 MR. TATUM: Oh, sure.  
 25 MS. CONLEY: -- to the top of the

101

1 MR. TATUM: Yes.  
 2 MS. CONLEY: Okay.  
 3 Q. (By Mr. Tatum) Did I accurately read that  
 4 sentence there under Paragraph 10?  
 5 A. Yes.  
 6 Q. Okay. Can you tell me what evidence that  
 7 statement that I just read is based on?  
 8 MS. KORGAONKAR: And I'll object to the  
 9 extent that that calls for a legal conclusion that  
 10 that the word "evidence" carries a legal significance.  
 11 You can answer the question if you're able to.  
 12 MR. TATUM: And if it helps, I can  
 13 rephrase it.  
 14 MS. KORGAONKAR: You can also look at  
 15 the document.  
 16 THE WITNESS: Right. I'm actually  
 17 looking at it now.  
 18 A. Well, can you just -- can you rephrase the  
 19 question?  
 20 Q. (By Mr. Tatum) Absolutely. In its Amended  
 21 Complaint, the Texas League is alleging or citing  
 22 evidence demonstrating that the Texas legislature  
 23 departed from its usual procedures when it passed  
 24 SB 14. Can you tell me on what basis the Texas League  
 25 believes that the Texas Legislature departed from its

102

1 usual procedures when it passed SB 14?  
 2 MS. KORGAONKAR: I'll object just to the  
 3 extent that it could call for a legal conclusion, but  
 4 you can answer.  
 5 A. Right. I don't -- I don't know.  
 6 Q. (By Mr. Tatum) You don't know on what basis  
 7 the Texas League believes that the legislature  
 8 departed from its usual procedures when it passed  
 9 SB 14?  
 10 MS. CONLEY: Same objection. I just  
 11 want to make sure it's preserved.  
 12 A. Well, I mean, one thing I can say is that --  
 13 I mean, I do know that there were some amendments that  
 14 were -- that were -- you know -- that were proposed  
 15 that -- that -- you know -- that the legislature did  
 16 strike down that would have included, you know,  
 17 student IDs or, you know, other forms of ID that would  
 18 make it more -- make the bill better.  
 19 Q. (By Mr. Tatum) Do you have anything else on  
 20 that question?  
 21 MS. CONLEY: Object to the form.  
 22 MS. KORGAONKAR: Asked and answered.  
 23 THE WITNESS: Huh?  
 24 Q. (By Mr. Tatum) I'm just wondering if I can  
 25 ask my next question or if you have more?

104

1 with discriminatory intent?  
 2 MS. KORGAONKAR: Objection to the extent  
 3 that "discriminatory intent" in this litigation is a  
 4 legal term. You can ask the question if you're able  
 5 to.  
 6 A. Any legislator? I don't know. Any  
 7 legislator?  
 8 Q. (By Mr. Tatum) I'll --  
 9 MS. KORGAONKAR: Do you understand the  
 10 question?  
 11 A. I mean, restate the question again to make  
 12 sure I understand.  
 13 Q. (By Mr. Tatum) Sure.  
 14 A. Uh-huh.  
 15 Q. Does the Texas League believe that any  
 16 legislator who voted for SB 14 acted with the intent  
 17 to discriminate by doing so?  
 18 A. That voted for it?  
 19 Q. Yes.  
 20 A. Yes.  
 21 Q. And what is that belief based on?  
 22 A. You know, as I said before, after, you know,  
 23 the amendments, you know, were passed to be more  
 24 inclusive, you know, the way that it is now, the way  
 25 that they voted on it, you know, with limited -- I

103

1 A. You can ask your next question.  
 2 Q. Okay. In this same vein, does the Texas  
 3 League believe that the Texas legislature acted  
 4 improperly in the way that it enacted SB 14?  
 5 MS. KORGAONKAR: Objection for  
 6 vagueness. It also calls for a legal conclusion.  
 7 It's not clear what "improperly" means.  
 8 A. (No verbal response.)  
 9 Q. Again, the Texas League has alleged in its  
 10 Complaint that the Texas legislature departed from its  
 11 usual procedures when it passed SB 14. You've  
 12 testified that certain amendments that were proposed  
 13 were ultimately rejected. Other than that, on what  
 14 basis does the Texas League believe that the Texas  
 15 Legislature departed from its usual procedures when it  
 16 passed SB 14?  
 17 A. (No verbal response.)  
 18 Q. Mr. Green, if you like, we can -- I'm sorry  
 19 if I interrupted you.  
 20 A. I mean, you can go ahead.  
 21 Q. If you like, we can come back to this later  
 22 and I can just move on, if that's all right with you.  
 23 A. Yeah, that's fine.  
 24 Q. Okay. Mr. Green, does the Texas League  
 25 believe that any legislator who voted for SB 14 acted

105

1 guess, with the limited forms of ID, I mean, it -- it  
 2 -- I mean, it can be said that they clearly knew that  
 3 some people would be left out of the process because  
 4 of that fact and they still went ahead and voted on it  
 5 anyway.  
 6 Q. Does the Texas League believe that the  
 7 legislature, in enacting SB 14, intended to harm any  
 8 specific minority group?  
 9 MS. KORGAONKAR: Objection for vagueness  
 10 on harm.  
 11 A. What do you mean by "harm"?  
 12 Q. (By Mr. Tatum) Does the Texas League believe  
 13 that the Texas Legislature intended to negatively  
 14 impact or negatively affect any minority group when it  
 15 enacted SB 14?  
 16 A. Yes.  
 17 Q. And what is that belief based on?  
 18 A. Well, I mean, as I said before, one example  
 19 would be student -- student ID. I mean, previously  
 20 student IDs were able to vote. And that's, you know,  
 21 a key population. And now, you know, those eligible  
 22 voters, you know, cannot use their student IDs to vote  
 23 under this new SB 14 law.  
 24 Q. Does the Texas League believe that only  
 25 minority students with college IDs are impacted by --



106

1 in the way that you just described?

2 A. Minority IDs, I think they would -- they  
3 would be impacted more than the non-minorities.

4 Q. And is that belief based on any kind of study  
5 or analysis?

6 A. I mean, like I said -- as I said before, you  
7 know, in order to get one of the forms of ID,  
8 especially for those out-of-state students, and  
9 especially the ones that are, you know African  
10 American and, you know, Hispanic, like I said, because  
11 of their economic status across the board compared to,  
12 you know, their white counterparts, it's -- it puts --  
13 it puts -- it puts a burden for them, uh-huh.

14 Q. Does the Texas League support the idea that  
15 only registered voters should be allowed to vote?

16 A. Only registered voters?

17 Q. Yes.

18 A. Yes, uh-huh.

19 Q. Does the Texas League believe that Texas  
20 should make sure that people attempting to vote are  
21 registered voters?

22 A. Okay. Restate your question --

23 Q. Sure.

24 A. -- to make sure I understand.

25 Q. Does the Texas League believe that the State

108

1 casting a vote, they should be the same person who is  
2 registered to vote? In other words, does the Texas  
3 League believe that voter fraud should be prevented?

4 MS. KORGAONKAR: Objection. That's a  
5 compound question as stated.

6 Q. (By Mr. Tatum) Okay. Let me rephrase.

7 A. Uh-huh.

8 Q. Does the Texas League believe that the person  
9 who is registered to vote -- a person who is duly  
10 registered to vote should be the same person that is  
11 attempting to vote on election day?

12 A. Well, I mean, we believe that everyone who  
13 has the right to vote has a right to vote.

14 Q. And does -- do you believe that when a  
15 registered voter is voting, we should make sure that  
16 they're the same person -- let me retract.

17 Mr. Green, do you think voter fraud should be  
18 illegal?

19 A. I mean, I don't -- I mean, I don't know about  
20 -- I mean, I don't know anything about pretty much  
21 voter fraud, but -- but the way that SB 14 is on the  
22 books now, you know, as I said before, makes it --  
23 makes it hard for certain people to actually vote.  
24 And we believe that everyone who has a right to vote  
25 should, in fact, have a right to vote without any --

107

1 of Texas should make sure that people attempting to  
2 vote are registered voters?

3 A. Well, I don't know exactly what the State of  
4 Texas should do, but I know that everyone who is  
5 registered to vote should have the right to vote and  
6 shouldn't have any barriers towards that -- towards  
7 that right.

8 Q. Does the Texas League believe that -- and  
9 this might be repeating my previous question and let  
10 me know if it is. Does the Texas League believe that  
11 the Texas should make -- that the State of Texas  
12 should make sure that the person who is registered to  
13 vote is the same person who is attempting to vote?

14 A. One more time.

15 Q. Does the Texas League believe that the State  
16 of Texas should make sure that a person who is  
17 registered to vote is the same person who is  
18 attempting to vote?

19 A. I mean, like, as before I said before, I  
20 don't know, you know, what the State of Texas should  
21 do, but I know currently, the way it is now does leave  
22 out, you know, a significant amount of people and  
23 makes it harder for them to vote.

24 Q. Okay. Leaving the State of Texas out of it,  
25 does the Texas League believe that when someone is

109

1 any -- you know -- without any burdens or challenges  
2 to it.

3 Q. But do you think voter fraud should be  
4 illegal?

5 A. Like I said, I think everyone who has a right  
6 to vote should have a right to vote.

7 Q. Mr. Green, you're not answering my question.  
8 I'm looking for a "yes" or "no."

9 MS. KORGAONKAR: Maybe I'll object to  
10 vagueness to the term "voter fraud."

11 Q. (By Mr. Tatum) Okay. Do you have the notice  
12 of this deposition in front of you in there somewhere?

13 A. (No verbal response.)

14 Q. Do you have the notice in front of you?

15 A. I do, uh-huh.

16 Q. Would you mind turning to Page 5, please?

17 A. (Complying.)

18 Q. When I refer to "voter fraud," I'm referring  
19 to that term as it is defined in this notice and as it  
20 was used in the deposition topics. If you would,  
21 please, take a moment to just review that definition  
22 and let me know when you're finished.

23 A. (Complying.) Okay.

24 Q. Have you had a chance to review that  
25 definition?

110

1 A. Uh-huh.  
 2 Q. Okay. Having reviewed what I mean when I say  
 3 "voter fraud," do you believe that voter fraud should  
 4 be illegal?  
 5 A. Should be illegal?  
 6 MS. KORGAONKAR: I'll just note for the  
 7 record that I don't know this is within any of the  
 8 topics in the notice. You should answer the question  
 9 to the extent that you're able to. And I'd also like  
 10 to note that some of the topics related -- that do  
 11 relate to voter fraud have been objected to. We did,  
 12 however, say that we'd produce a witness, but the  
 13 objections are maintained.  
 14 MS. CONLEY: Do you mind just repeating  
 15 your question to make sure that. . .  
 16 MR. TATUM: You bet.  
 17 MS. CONLEY: Yeah. Thank you.  
 18 Q. (By Mr. Tatum) Mr. Green --  
 19 A. Uh-huh.  
 20 Q. -- having reviewed what I mean when I say  
 21 "voter fraud," do you believe that voter fraud should  
 22 be illegal?  
 23 A. Well, I mean, I'm not -- I'm not a  
 24 legislature and I don't -- and I don't make laws, but  
 25 I believe everyone who has the right to vote should

112

1 THE WITNESS: Uh-huh.  
 2 A. Right. I mean, voter fraud is illegal.  
 3 Correct?  
 4 Q. (By Mr. Tatum) Mr. Green, I'm asking you a  
 5 question.  
 6 A. Okay.  
 7 Q. And I'd appreciate it if you would answer for  
 8 me, please.  
 9 A. Okay.  
 10 Q. Mr. Green, do you think it should be illegal  
 11 to make or knowingly process a counterfeit of an  
 12 official election ballot?  
 13 A. Yes.  
 14 Q. Do you think it should be illegal to sign a  
 15 name, other than one's own, to a petition proposing an  
 16 initiative, referendum, recall, or nomination of a  
 17 candidate for office?  
 18 A. That it should be illegal?  
 19 Q. Yes.  
 20 A. Yes.  
 21 Q. Mr. Green, do you think it should be illegal  
 22 to knowingly sign more than once for the proposition,  
 23 question, or candidate in one election?  
 24 A. Yes.  
 25 Q. Mr. Green, do you think it should be illegal

111

1 have a right to vote and. . .  
 2 Q. Mr. Green, do you think voter fraud should be  
 3 illegal?  
 4 MS. KORGAONKAR: Can I -- can I just  
 5 make a suggestion?  
 6 MR. TATUM: Sure.  
 7 MS. KORGAONKAR: It might be helpful to  
 8 -- I appreciate that there's a definition here. It  
 9 might, nonetheless, for the purposes of getting  
 10 through this, be more helpful if you were to break  
 11 down voter fraud.  
 12 MR. TATUM: Okay. I'm happy to do that.  
 13 Q. (By Mr. Tatum) Mr. Green, I represent to you  
 14 that the term "voter fraud" is defined as fraudulent  
 15 or deceptive acts committed to influence the act of  
 16 voting and includes both criminal and civil offenses  
 17 and violations. "Voter fraud" can mean many different  
 18 things.  
 19 Mr. Green, do you believe that making or --  
 20 making or knowingly possessing a counterfeit -- sorry.  
 21 Mr. Green, do you believe that it should be  
 22 illegal to make or knowingly possess a counterfeit of  
 23 an official election ballot?  
 24 MS. KORGAONKAR: Mr. Green, this is just  
 25 a "yes" or "no" question.

113

1 to sign a petition proposing an initiative or  
 2 referendum when the signer is not a qualified voter?  
 3 A. Yes.  
 4 Q. Mr. Green, do you think it should be illegal  
 5 to vote or attempt to vote in the name of another  
 6 person?  
 7 A. More than once on a -- yes.  
 8 Q. I'm sorry. I didn't understand your answer.  
 9 A. Yes.  
 10 Q. Mr. Green, do you think it should be illegal  
 11 to vote or attempt to vote more than once during the  
 12 same election?  
 13 A. More than once in the same election, yes.  
 14 Q. Mr. Green, do you think it should be illegal  
 15 to intentionally make a false affidavit swearing  
 16 falsely -- swear falsely or falsely affirm under an  
 17 oath required by statute regarding one's voting  
 18 status?  
 19 A. Yes.  
 20 Q. Mr. Green, do you think it should be illegal  
 21 to vote or attempt to vote in an election after being  
 22 disqualified or when the person knows that he or she  
 23 is not eligible to vote?  
 24 A. When the person knows that he or she is not  
 25 eligible to vote, yes.



<p style="text-align: right;">114</p> <p>1 Q. Mr. Green, do you believe that it should be 2 illegal to knowingly solicit or encourage a person who 3 is not qualified to vote in an election? 4 A. Knowingly solicit or encourage a person who 5 is not qualified to vote in an election, yes. 6 Q. Mr. Green, without going through all of the 7 various forms of voter fraud again, does the Texas 8 League believe that SB 14 deters voter fraud? 9 A. Does it deter voter fraud? 10 Q. Yes. 11 A. I mean, I can't -- I mean, I don't know. I 12 don't know if it deters voter fraud. 13 Q. Does the Texas League believe that it does? 14 MS. KORGAONKAR: Okay. That's been 15 asked and answered. He said he didn't know. 16 Q. (By Mr. Tatum) Mr. Green, has any 17 constituent of the Texas League ever expressed support 18 for voter ID laws? 19 A. Any constituent? 20 Q. Yes. 21 A. Voted -- I mean, expressed support, I don't 22 know. 23 Q. Has any constituent of the Texas League ever 24 expressed support specifically for SB 14? 25 A. Expressed support, I don't -- not to my</p>	<p style="text-align: right;">116</p> <p>1 to vote? 2 MS. KORGAONKAR: Objection. That 3 assumes facts not the evidence. 4 A. I mean, I wasn't aware of that poll. 5 Q. Okay. 6 (Exhibit No. 7 marked.) 7 Q. Mr. Green, I'm handing you what's been marked 8 as Exhibit 7. 9 A. Uh-huh. Okay. 10 Q. Mr. Green, I represent to you that what I 11 just handed you is a graphical representation of the 12 poll I just referenced, the poll conducted by the 13 Texas Tribune and the University of Texas in February 14 of 2011. Can you confirm by looking at this graph the 15 percentage of people who responded to this poll that 16 agree with the proposition that registered voters 17 should be required to present a government-issued 18 photo ID before they can be allowed to vote? 19 MS. KORGAONKAR: And I'll object to that 20 question. As Mr. Green just stated, he has no 21 familiarity with this document whatsoever. I'll also 22 object to the characterization of the document as 23 we've never seen it, not being able to testify to any 24 of the contents. 25 (Speaking simultaneously.)</p>
<p style="text-align: right;">115</p> <p>1 knowledge. I don't know. 2 Q. Does the Texas League contend that voter ID 3 requirements were not popular amongst the citizens of 4 Texas when SB 14 was being considered in 2011? 5 MS. KORGAONKAR: Objection to the use of 6 "contend." It's also compound. 7 MS. CONLEY: And it calls for 8 speculation. 9 MR. TATUM: I'll rephrase. 10 Q. (By Mr. Tatum) Mr. Green, does the Texas 11 League believe that the citizens of Texas did not 12 support voter ID requirements in 2011? 13 A. I mean, I don't recall any -- I mean, looking 14 at any polls or statistics, but I do know that our 15 constituency base, the ones who are most impacted, and 16 we, as an organization don't support it because, you 17 know, of the burden that it has on young people and 18 people of color. 19 Q. Mr. Green, are you aware that according to a 20 poll -- you mentioned polls -- conducted by the Texas 21 Tribune and the University of Texas in February 2011 22 -- so this was just before SB 14 was enacted -- that 23 75 percent of registered voters agreed with the 24 proposition that voters should have to present a 25 government-issued photo ID before they can be allowed</p>	<p style="text-align: right;">117</p> <p>1 MS. CONLEY: Are you just asking him to 2 read the document? 3 MR. TATUM: Yes. 4 THE REPORTER: Let me get her objection 5 first. 6 MS. CONLEY: Okay. 7 THE REPORTER: Go ahead. 8 MS. KORGAONKAR: We don't agree with the 9 way it was represented by counsel. 10 MS. CONLEY: I just asked the question, 11 are you just asking him to read the document? 12 MR. TATUM: Yes. 13 MS. CONLEY: That's -- 14 MR. TATUM: Yes. 15 Q. (By Mr. Tatum) And I'll represent to you 16 again that this is the graphical representation of the 17 poll that I referenced earlier conducted by the Texas 18 Tribune and the University of Texas in 2011 showing 19 the results of that poll. I'm representing to you 20 that that's what this graph shows. 21 A. Okay. 22 Q. Do you understand? 23 A. I see. 24 Q. Okay. Looking at this graph, do you see at 25 the top there where the question is presented and it</p>

118

1 states, and I quote, Do you agree or disagree that  
2 registered voters should be required to present a  
3 government-issued photo ID before they can be allowed  
4 to vote?

5 Do you see that sentence?

6 A. You're correct, I see that sentence.

7 Q. Okay. Looking at the graphical  
8 representation of the data, can you tell me what  
9 percentage of the people who responded to this poll  
10 indicated that they agree with that proposition?

11 A. I mean, 75 percent. But let me -- but let me  
12 just -- let me just be clear. When you say  
13 government-issue photo ID, you know, for state --  
14 state institutions, those are -- those are -- state  
15 institutions IDs, that's government-issued ID, as  
16 well. I mean, government-issued IDs, as well.

17 Q. Okay. So do you think that the information  
18 in this graph is inaccurate then?

19 MS. KORGAONKAR: Objection. That  
20 mischaracterizes testimony.

21 A. I mean, that's not what I'm saying. What I'm  
22 saying is -- I mean, this is poll -- I see this poll  
23 here. I mean, but I also believe that everyone who --  
24 who is eligible to vote should have the right --  
25 should have the right to vote and. . .

120

1 underlying data.

2 MR. TATUM: Yes.

3 Q. (By Mr. Tatum) Again, I'm representing to  
4 you that this is data compiled by the Texas Tribune  
5 and the University of Texas in a poll that they  
6 conducted in February 2011. Mr. Green, looking at the  
7 document I've just given you --

8 A. Uh-huh.

9 Q. -- can you tell me -- looking at the left  
10 side of that graph, can you tell me what percentage of  
11 African Americans who responded to this poll agree  
12 that registered voters should be required to present a  
13 government-issued photo ID before they can be allowed  
14 to vote?

15 MS. CONLEY: And just so we're clear,  
16 you're not asking him whether or not that number is  
17 accurate, just whether this is what the document says.  
18 Right?

19 MR. TATUM: Yes.

20 Q. (By Mr. Tatum) I'm asking you to, if you  
21 would, please, look at this document and tell me what  
22 percentage this graph depicts --

23 A. Right.

24 Q. -- of African Americans who responded to this  
25 poll who indicated that they agree that registered

119

1 Q. Okay. Let me rephrase my question. Would  
2 you agree -- looking at the information on this graph,  
3 would you agree that this graph indicates that 75  
4 percent of the people who responded to this poll  
5 indicated that they agree that registered voters  
6 should be required to present a government-issued  
7 photo ID before they can be allowed to vote?

8 A. Correct, looking at this document, I do see  
9 that.

10 (Exhibit No. 8 marked.)

11 Q. Okay. Mr. Green, I'm handing you what's been  
12 marked as Exhibit 8. Mr. Green, I represent to you  
13 that this is another graphical representation of the  
14 results of the poll that we've been discussing. And I  
15 represent to you that this graph depicts the results  
16 of that poll broken down amongst different races and  
17 ethnicities.

18 MS. KORGAONKAR: We'll object here again  
19 to the extent that Mr. Green is not familiar with the  
20 document.

21 Q. (By Mr. Tatum) And I will say on the record  
22 that I'm introducing this to you for the first time  
23 and I understand this is the first time you've seen  
24 this document.

25 MS. KORGAONKAR: Or any of the

121

1 voters should be required to present a  
2 government-issued photo ID before they can be allowed  
3 to vote?

4 A. I mean, this document says 63 percent.

5 Q. And can you tell me what percentage of Latino  
6 respondents to this poll indicated that they agree  
7 that registered voters should be required to present a  
8 government-issued photo ID before they can be allowed  
9 to vote?

10 A. The document says 68 percent.

11 Q. Looking at this graph, would you agree that  
12 the majority of African Americans and Latinos who  
13 responded to this poll supported voter ID requirements  
14 in 2011?

15 A. I want to make sure I understand your  
16 question. Say it again.

17 Q. Sure. Based on the information contained in  
18 this graph --

19 A. Uh-huh.

20 Q. -- would you agree that the majority of  
21 African Americans and Latinos who responded to this  
22 poll supported voter ID requirements in 2011?

23 A. I mean, according to this graph, it does say  
24 that. I mean, it says 63 percent of African Americans  
25 and 68 percent of Latino agree that registered voters

<p style="text-align: right;">122</p> <p>1 should be required to present a government-issued ID  2 before they're allowed to vote, according to this  3 graph, uh-huh.  4 Q. All right. I've got one more graph. It's  5 the last one, I promise.  6 A. Okay.  7 (Exhibit No. 9 marked.)  8 Q. Mr. Green, I'm handing you what's been marked  9 as Exhibit 9. Mr. Green, with knowledge that you've  10 never seen this document before --  11 A. Uh-huh.  12 Q. -- I represent to you that this document  13 represents the graphical results or is a graphical  14 representative of the results -- of the results of the  15 poll conducted by the Texas Tribune and the University  16 of Texas in February of 2011.  17 Mr. Green, looking at this graph, could you  18 tell me what percentage of democrats who responded to  19 this poll support the proposition that registered  20 voters should be required to present a  21 government-issued photo ID before they can be allowed  22 to vote?  23 A. I mean, this document says 58 percent.  24 Q. And could you tell me what percentage of  25 independents agree that registered voters should be</p>	<p style="text-align: right;">124</p> <p>1 whether you're asking whether the League believes this  2 or whether he believes this.  3 MR. TATUM: Okay.  4 Q. (By Mr. Tatum) Mr. Green, do you believe  5 that elected lawmakers listen to the voices and  6 concerns of their constituents when drafting or  7 considering legislation?  8 MS. KORGAONKAR: Does he in his personal  9 capacity or does he as the League? I want to make  10 sure the record is clear.  11 MR. TATUM: Sure. I'll ask both.  12 Q. (By Mr. Tatum) Does the Texas League believe  13 that elected lawmakers listen to the voices and  14 concerns of their constituents when drafting or  15 considering legislation?  16 A. I mean, I can't -- I mean, they should -- I  17 mean, they should listen to their constituents. I  18 mean, those are the folks who elected them.  19 Q. Does the Texas League believe that they do  20 listen to the voices of their constituents?  21 A. That they do? You know, I can't answer that  22 question. I mean, I would hope that they -- that they  23 would, uh-huh.  24 Q. Okay. Mr. Green, do you think it's at least  25 possible that, based on the results of this poll, that</p>
<p style="text-align: right;">123</p> <p>1 required to present a government-issued photo ID  2 before they can be allowed to vote?  3 A. I mean, it states -- it states 70 percent,  4 uh-huh.  5 Q. Okay. Mr. Green, having worked in the  6 legislature for a short amount of time, as you stated  7 previously, would you agree that elected lawmakers  8 listen to the voices of their constituents?  9 MS. KORGAONKAR: And I'll just object,  10 because Mr. Green is here to testify on behalf of the  11 League, not as himself, as anyone who's worked for the  12 legislature or even just as a Texan.  13 You can still answer the question.  14 A. Restate the question.  15 Q. (By Mr. Tatum) Sure. Would you agree that  16 elected lawmakers listen to the voices of their  17 constituents?  18 MS. KORGAONKAR: And I'll just make the  19 same objection.  20 A. That's what should happen, uh-huh.  21 Q. (By Mr. Tatum) Do you believe that elected  22 lawmakers listen to the concerns of their constituents  23 when drafting or considering legislation?  24 MS. KORGAONKAR: I'll make the same  25 objection, but it would be helpful if you'd clarify</p>	<p style="text-align: right;">125</p> <p>1 SB 14 was enacted according to the wishes of Texas  2 citizens and not because of a discriminatory intent?  3 MS. KORGAONKAR: And I'll just object  4 again that this is a 30(b)(6). He's here to testify  5 as the League. And I'll make, again, the underlying  6 objection that he has no familiarity, neither does the  7 League, with this poll.  8 THE WITNESS: Uh-huh.  9 MS. KORGAONKAR: Subject to that, you  10 can answer the question.  11 A. Right. I mean, I can't -- I mean, I don't  12 know -- I mean, I don't know, according to this graph,  13 if that is -- if that is the case. I don't know.  14 Q. Notwithstanding this poll and these graphs,  15 does the Texas League believe that it's possible that  16 SB 14 was enacted according to the wishes of Texas  17 citizens and not because of a discriminatory intent  18 held by legislators?  19 A. Okay. Repeat it one more time.  20 Q. Sure.  21 A. Uh-huh.  22 Q. Does the Texas League believe that it's at  23 least possible that SB 14 was enacted according to the  24 wishes and desires of citizens of Texas and not  25 because of a discriminatory intent held by the</p>

126

1 legislators that voted for that bill?

2 A. I mean, I don't know which particular, I

3 guess, Texas citizens you're referring to, because,

4 you know, there's a lot of citizens that -- I mean,

5 that are Texas citizens who are left out of the

6 process because of, you know, the current laws on the

7 books as it relates to SB 14.

8 Q. Does the Texas League believe that no

9 citizens of Texas support voter ID requirements?

10 A. That no citizens?

11 Q. Correct.

12 A. I mean, I would imagine some citizens support

13 it.

14 Q. Do you have the Amended Complaint in front of

15 you?

16 A. (No verbal response.)

17 Q. Do you have it in front of you?

18 A. Uh-huh.

19 Q. Okay. If you would please turn to Page 6.

20 A. (Complying.)

21 Q. Now, the question I'm about to ask is going

22 to be in reference to Paragraph 30. Does the Texas

23 League believe that SB 14 forces the Texas League to

24 divert its limited resources, both financial and

25 otherwise, away from fulfilling its core mission of

128

1 Q. Yes.

2 A. I mean, it's not the primary.

3 Q. But does the Texas League believe that

4 educating its constituents regarding voting

5 requirements, and I should said voting laws, is a core

6 mission of the Texas League?

7 MS. KORGAONKAR: Objection. It's been

8 asked and answered. You can answer.

9 A. All right. I mean, one of the things that we

10 do is, like I say, we engage in people in all respects

11 of the electoral process. So we do -- you know -- you

12 know -- educate -- you know -- around -- you know --

13 different laws or issues that impact them directly.

14 Q. (By Mr. Tatum) Does the Texas League believe

15 that educating its constituents regarding the

16 requirements of SB 14 falls outside of its stated

17 mission?

18 A. I mean, as one of our key sole

19 responsibilities, yes.

20 Q. And how is educating its constituents

21 regarding the requirements of SB 14 different from

22 educating Texas League constituents regarding voter

23 requirements prior to SB 14?

24 A. You know, I mean, as I said before, our --

25 our main source -- or our main -- is to educate them

127

1 registering and mobilizing young people of color to

2 vote, and, instead, towards helping its existing base

3 of voters secure one of the acceptable forms of ID

4 under SB 14?

5 A. Yeah.

6 Q. What is that belief based upon?

7 A. Well, I mean, it's based upon our pursuit --

8 our core mission is to register voters to educate them

9 about the process, you know, and also to do, sort of,

10 what we call "leadership training."

11 Now, because of the enactment of SB 14, we've

12 been short of -- we're -- we have diverted our

13 resources to pretty much, you know, educate not only

14 -- not only our existing base of voters, but also our

15 new base of voters or constituency or population about

16 the -- about the particular SB 14 requirements under

17 the law.

18 So rather than us doing our normal function,

19 we have diverted -- we have diverted our resources to

20 pretty much educating people about, you know, how to

21 obtain one of the forms of ID.

22 Q. Does the Texas League believe that educating

23 its constituents about voting requirements is a core

24 function of the Texas League?

25 A. Educating them about voting requirements?

129

1 about the electoral process, to educate them about how

2 issues, you know, impact them, how issues affect them.

3 But since a lot of our constituent base, particularly

4 college students are affected by this law, we want to

5 make sure that -- are affected -- I mean, the ones

6 that are affected by this law -- I mean, we want to

7 make sure that those who are eligible are eligible to

8 vote.

9 And -- you know -- you know -- we thought we

10 had our existing base secured, but, now, with the new

11 law, we have to make sure that they -- that they who

12 voted previously, prior to SB 14, can vote again, you

13 know, after the law has been enacted.

14 So it has pretty much put a strain on, you

15 know, us being able to, you know, increase our voting

16 universe, add more people to the rolls through our

17 main focus -- one of our main focus is voter

18 registration has been deterred to actually, basically,

19 you know, make sure that our existing base of people

20 who will be registered who voted before and those who

21 are -- you know -- pretty much negative impact get the

22 requirements, so that they can vote -- that they can

23 vote again.

24 MS. KORGAONKAR: Just slow down.

25 Q. (By Mr. Tatum) Mr. Green, in that allegation

130

1 that I read on Page 6 of the Complaint in Paragraph 30  
 2 --  
 3 A. Uh-huh.  
 4 Q. -- it makes a reference to limited resources,  
 5 financial and other. Obviously "financial resources"  
 6 means money. What does "other" refer to?  
 7 A. I mean, time.  
 8 Q. Anything else?  
 9 A. I mean, just pretty much -- pretty much time  
 10 and -- and -- right, pretty much time and, you know,  
 11 financial resources, uh-huh.  
 12 Q. So when they say limited resources, financial  
 13 and other, am I correct to say that you're referring  
 14 to financial resources and time? Is that what you --  
 15 is that correct?  
 16 A. I mean, people's time is a resource.  
 17 Q. I agree.  
 18 A. Right.  
 19 Q. Are there any other kinds of resources that  
 20 the Texas League is referring to there?  
 21 A. I mean, other, no.  
 22 Q. (Indicating.)  
 23 A. Oh, I said other, no.  
 24 Q. I'm sorry. I didn't hear you.  
 25 Of all the resources at the disposal of the

132

1 different -- you know -- meetings to talk about -- you  
 2 know -- you know -- how do we better communicate this  
 3 all to our constituent base. I mean, so all those are  
 4 examples of how -- you know -- our normal, I guess,  
 5 time during our core mission has been diverted to  
 6 combating this SB 14 law, uh-huh.  
 7 Q. Mr. Green, looking at Paragraph 31 on Page 6,  
 8 do you see that paragraph?  
 9 A. I do.  
 10 Q. Okay. Can you tell me what resources have  
 11 been diverted towards assessing who among the Texas  
 12 League constituency lacks one of the forms of required  
 13 photo ID under SB 14?  
 14 A. As I said before, I know -- you know --  
 15 rather than just -- you know -- making phone calls to  
 16 them about getting out the vote -- you know -- we're  
 17 asking them -- you know -- do you have one of the  
 18 forms of required ID.  
 19 So it's -- it's taken extra time to have a  
 20 conversation with them about if they do have -- you  
 21 know -- one of the required forms of ID. And if not,  
 22 we're spending extra time -- you know -- call time or  
 23 either in-person time telling them the specific steps  
 24 of how to do it. And -- you know -- all that -- you  
 25 know -- all that takes -- takes time, and it takes

131

1 Texas League, what portion of those resources are you  
 2 having to divert towards SB 14-related activities?  
 3 A. Which portion of it? Well, all of our -- I  
 4 mean, pretty much a combination of all the re -- all  
 5 the re -- pretty much all the resources that goes  
 6 into, you know, our daily core mission. So all of  
 7 that has been -- you know -- a portion of that has  
 8 really been diverted to, you know, incorporating, I  
 9 guess, making sure that people are educated in pretty  
 10 much all aspects, either it be with voter  
 11 registration, either it be with voter education or  
 12 even with leadership training. We have to divert some  
 13 of the resource that was geared towards that to divert  
 14 to make sure that it covers, you know, incorporating  
 15 an SB 14 education component, as well.  
 16 Q. Do you know what kind of time resources are  
 17 being diverted towards SB 14-related activities?  
 18 A. I mean, I can say with myself and our state  
 19 director and even members of our -- of our staff --  
 20 you know -- rather than -- you know -- us -- you know  
 21 -- doing our essential Get Out the Vote -- you know --  
 22 activities -- you know -- we're now -- you know --  
 23 doing education -- going to do -- you know --  
 24 educational presentations. I know myself and our  
 25 state director, we attend -- you know -- so many

133

1 energy, and it takes more people.  
 2 Q. What kind of financial resources have been  
 3 diverted towards assessing who among the Texas League  
 4 constituency lacks one of the forms of required photo  
 5 ID under SB 14?  
 6 A. Financial resources, I know -- I know -- now,  
 7 this -- this --  
 8 MS. KORGAONKAR: Objection as to form.  
 9 Sorry.  
 10 A. Uh-huh. And what do you mean by "forms"?  
 11 Q. (By Mr. Tatum) That's a question for your  
 12 attorney. Were you through answering the question?  
 13 A. No. I haven't started answering the  
 14 question.  
 15 Q. Okay. By all means, proceed.  
 16 A. Right. I'm saying, I mean, what do you mean  
 17 by "forms"?  
 18 Q. Oh, I'm sorry. You're referring to forms in  
 19 my question, not the objection, form.  
 20 A. In your question, right.  
 21 Q. Sorry. It says here in the Complaint under  
 22 Paragraph 31, it says, In particular, the Texas League  
 23 is now forced to undertake such activities as  
 24 assessing who among its constituency lacks one of the  
 25 forms of required photo IDs under SB 14.



134

1 I did not write this sentence, but I can only  
2 assume it means the various documents that are  
3 required to vote, the various forms of the photo ID  
4 that are required to vote under SB 14, a driver's  
5 licence, a concealed handgun license, state-issued  
6 photo ID, et cetera.

7 A. No. I thought your question was forms of --  
8 I think you said forms of resources or something or  
9 forms of --

10 Q. Okay. Let's start over.

11 A. Right.

12 Q. Let's start over. Can you tell me what  
13 amount of financial resources have been diverted  
14 towards assessing who among the Texas League  
15 constituency lacks one of the forms of required photo  
16 under SB 14?

17 A. I mean, I don't know the specific amount.

18 MS. KORGAONKAR: I'm objecting to the  
19 form of the question. You can answer it.

20 A. I mean, I don't know the specific amount.

21 Q. (By Mr. Tatum) Mr. Green, can you tell me  
22 what -- can you tell me how much time has been spent  
23 hosting public education campaigns designed to inform  
24 young voters of color that Defendants, State of Texas,  
25 previously court-rejected photo ID law is now in

136

1 document has been produced to the Defendants in the  
2 litigation. Have you seen this document before?

3 A. Yes.

4 Q. Now, there's a box at the top of this  
5 document that's obscuring the title of it or whatever  
6 is at the top there. Do you know what's behind that  
7 box?

8 A. Oh, that's our logo.

9 Q. That's the Texas League logo underneath that  
10 box?

11 A. Correct.

12 Q. Okay. Mr. Green, this document says, down  
13 there in the middle, the third paragraph, it says,  
14 quote, With the long history of voter  
15 disenfranchisement in Texas oh the confusion of this  
16 particular bill, we would have to do significant  
17 election protection work for this election cycle.  
18 Below are two ways in which we could make this happen.

19 Is that a correct reading of that paragraph?

20 A. Correct.

21 Q. Okay. And below that it says -- it lists, 1,  
22 Launch a comprehensive education campaign. And 2, Run  
23 a comprehensive election protection plan. Is that  
24 correct?

25 A. Correct.

135

1 effect?

2 A. Well, I mean, I can't give the exact -- the  
3 exact amount, but I know we are spending more time  
4 taking more trips -- well, not more -- well, actually,  
5 more trips to college campuses. I know we've been  
6 called upon by a number of organizations who have use  
7 as their constituency base that they've asked us,  
8 because, you know, we're very familiar with the law,  
9 to come to their events or to their public forums and,  
10 you know, make a presentation about it. And some of  
11 those are during the weekends, some of those are after  
12 hours, some of them are during the day. But it's --  
13 it's -- it's -- it's out of -- it's out of the norm  
14 and we're making it so frequently. Because one of our  
15 key is, we want to make sure that -- you know --  
16 particularly young people and students, we want to  
17 make sure that they -- you know -- you know -- they  
18 were able to vote prior to SB 14, and we want to make  
19 sure that they are. And that's one of the things that  
20 we have been doing critically is ensuring that -- that  
21 -- that base that voted in 2012 can vote again in 2013  
22 and 2014.

23 (Exhibit No. 10 marked.)

24 Q. Mr. Green, I'm handing you what's been marked  
25 as Exhibit 10. Mr. Green, I represent that this

137

1 Q. And below that it appears to be some  
2 budgetary figures. Is that correct?

3 A. That's correct.

4 Q. Do you know if the comprehensive education  
5 campaign or the comprehensive protection plan  
6 referenced in the document were ever executed?

7 MS. KORGAONKAR: Objection. Compound.  
8 You can answer.

9 Q. (By Mr. Tatum) Let me rephrase. This  
10 document says, Below are two ways in which we could  
11 make this happen. To me, that indicates that the  
12 comprehensive education campaign and comprehensive  
13 election protection plan were just being proposed in  
14 this document.

15 A. Right.

16 Q. Did the Texas League ever launch a  
17 comprehensive education campaign as described in this  
18 document?

19 A. And this was back in 2012. I think, to the  
20 extent this -- I know this was just a proposal to  
21 receive funding. And I think -- back in 2012, I think  
22 our education campaign pretty much focused on just Get  
23 Out the Vote since, you know, the law wasn't enacted  
24 at that time.

25 Q. Did the Texas League ever run a comprehensive

138

1 election protection plan as described in this  
2 document?  
3 A. We did run a -- a -- I mean, not to this  
4 extent, not back in 2012, no.  
5 Q. All right. So, to your knowledge, neither of  
6 those activities listed there ever occurred?  
7 MS. KORGAONKAR: Objection. That  
8 mischaracterizes his testimony.  
9 Q. (By Mr. Tatum) Do you know if either one of  
10 those activities ever occurred?  
11 A. I mean, we did an education campaign, yes.  
12 Q. Okay.  
13 A. And we did an election protection campaign,  
14 right, but it was just to -- but just to educate --  
15 you know -- as a -- you know -- as a regular basis  
16 on -- you know -- Get Out the Vote.  
17 Q. Okay. At the bottom there under the heading  
18 Budget --  
19 A. Uh-huh.  
20 Q. -- it has a number of monetary figures --  
21 A. Correct.  
22 Q. -- corresponding to certain expenses --  
23 A. Uh-huh.  
24 Q. -- it looks like.  
25 A. Uh-huh.

140

1 A. Well, that was after -- that was after the  
2 law actually was -- was -- was enacted. That was, I  
3 think, in the summer of 2013.  
4 Q. Okay. And was a comprehensive election  
5 protection plan executed after the implementation of  
6 SB 14?  
7 A. Yes.  
8 Q. And do you recall if the financial resources  
9 required for those activities equaled the amount  
10 that's depicted below on this document?  
11 A. I don't -- I mean, I don't know. I mean, I  
12 don't know specifically. Like I said, this was just a  
13 proposal --  
14 Q. Okay.  
15 A. -- back in 2012.  
16 Q. But do you know how much it actually ended up  
17 costing to run those two programs?  
18 A. Actually, I don't know. I know we have a set  
19 budget and we allocate resources as -- as things  
20 happen.  
21 Q. Okay.  
22 A. But in terms of specific cost, I don't know.  
23 Q. What do you mean, "as things happen"?  
24 A. Right. Well, I know we normally do voter  
25 registration, voter education -- you know -- you know

139

1 Q. Does that represent the amount of financial  
2 resources that would need to be spent on one of those  
3 two activities?  
4 A. Yes, that was -- yes, that's what it's --  
5 yeah, correct, uh-huh.  
6 Q. And is that total amount there at the bottom,  
7 \$25,000, is that the amount required for both  
8 activities or just one?  
9 A. It would be a comprehensive -- I mean, a  
10 collaboration of both activities.  
11 Q. So are you saying that to launch a  
12 comprehensive education campaign, as described here,  
13 and run a comprehensive election protection plan, as  
14 described here, would require the budgetary expenses  
15 described below?  
16 MS. KORGAONKAR: Objection.  
17 Mischaracterizes.  
18 Q. (By Mr. Tatum) I'm just asking if that's  
19 what your understanding of these numbers is.  
20 A. I mean, it was a proposed budget based on our  
21 specific key target market -- I mean, our target  
22 precincts at that time.  
23 Q. And I'm sorry if I'm retreading ground here,  
24 but you stated that a comprehensive education campaign  
25 was executed with regard to SB 14. Correct?

141

1 -- our -- our normal stuff. But then when we find out  
2 or when there's, you know, something that we think  
3 will impact our -- our key population, you know, we  
4 have to make shifts to make sure that that is  
5 incorporated, as well. I mean, that's a key component  
6 that we don't want to leave out.  
7 Q. Are there resources -- well, let me back up.  
8 Does the Texas League devise or conduct an annual  
9 budget?  
10 A. Right. We do a projection.  
11 Q. A projection for that year's budget?  
12 A. Correct.  
13 Q. Does that budget include set dedicated funds  
14 for specific purposes?  
15 A. We have specific allocations, yes.  
16 Q. Are there funds in the budget that are  
17 reserved for things that come up, as you described it,  
18 on an as-needed-type basis?  
19 A. I mean, it's very limited. I mean, we have  
20 miscellaneous funds, but it's very limited.  
21 Q. But miscellaneous funds are set aside for  
22 things that come up?  
23 A. Yes.  
24 Q. And when you talk about financial resources  
25 that have been diverted towards SB 14 activities, have



142

1 those resources come from the set dedicated funds or  
 2 the miscellaneous funds?  
 3 A. It came from both.  
 4 Q. From both?  
 5 A. (Nods head affirmatively.)  
 6 Q. Looking back at this document here, the  
 7 comprehensive education campaign and the comprehensive  
 8 election protection plan referenced there, were those  
 9 being proposed in response to SB 14?  
 10 A. This was being proposed -- I guess we were  
 11 getting ourselves up just in case it wasn't  
 12 pre-cleared by the -- I mean, if -- if it went ahead  
 13 and was pre-cleared by the Department of Justice,  
 14 right.

15 Q. So this was being proposed kind of on a  
 16 contingent basis if SB 14 was pre-cleared. Is that  
 17 what you're saying?

18 MS. KORGAONKAR: Objection. I think  
 19 that mischaracterizes slightly.

20 Q. (By Mr. Tatum) Okay. Let me rephrase. The  
 21 comprehensive education campaign and the comprehensive  
 22 election protection plan that are being proposed in  
 23 this document, were those being proposed in response  
 24 to or because of SB 14?

25 A. Correct.

144

1 that's confusing as stated.

2 Q. (By Mr. Tatum) Would you like me to rephrase  
 3 the question?

4 A. Yes.

5 Q. Okay. Is educating young voters and Texas  
 6 League constituents about existing voter laws, is that  
 7 part of the Texas League's mission?

8 A. I mean, our mission is to register voters and  
 9 get them out to vote. I mean, it's not -- I mean,  
 10 it's not our core mission, but, you know, like I said,  
 11 anything that impacts them, we want to make sure that  
 12 they're aware of it. But our core mission is get  
 13 people registered and get them out to the polls.

14 Q. My question was: Is educating voters --

15 A. Uh-huh.

16 Q. -- about existing voting laws part of the  
 17 Texas League's mission?

18 A. Is it part of our mission?

19 Q. Yes.

20 MS. KORGAONKAR: That's been asked and  
 21 answered.

22 MR. TATUM: He didn't answer the  
 23 question.

24 MS. KORGAONKAR: Can you read back,  
 25 please?

143

1 Q. So when it says a comprehensive education  
 2 campaign targeting young voters to ensure that they  
 3 are aware of the election laws and their rights to  
 4 register and vote, when it says election laws, is it  
 5 referring to SB 14?

6 A. SB -- right, it's referring to SB 14 and --  
 7 pretty much SB 14 and what's required under that --  
 8 under that bill.

9 Q. Does a comprehensive education campaign -- or  
 10 is -- let me start over.

11 Is launching a comprehensive education  
 12 campaign regarding a voter law, is that part of the  
 13 core mission of the Texas League of Young Voters?

14 A. You know, as I said before, it's -- you know  
 15 -- one of our -- you know -- we want to make sure that  
 16 -- well, education is one of our core missions. Now,  
 17 maybe not -- now, maybe -- right. I mean, anything  
 18 that -- that would hinder our base from voting, we  
 19 want to make sure that they are -- that they are  
 20 educated on, you know, any laws or anything that would  
 21 hinder them from voting.

22 Q. So by educating its constituents regarding  
 23 SB 14, is the Texas League not fulfilling its mission  
 24 to educate voters regarding voter laws?

25 MS. KORGAONKAR: Objection. I think

145

1 THE REPORTER: What do you want me to  
 2 read back?

3 MS. KORGAONKAR: The -- not this  
 4 question that I objected to, but the one prior in  
 5 response to that, please.

6 (Requested portion read.)

7 Q. (By Mr. Tatum) And my question was: Is  
 8 educating young voters about existing voter laws, is  
 9 that part of the Texas League's mission, not  
 10 registering, but educating?

11 MS. KORGAONKAR: I make the same  
 12 objection.

13 A. Yeah, it's the same question.

14 Q. (By Mr. Tatum) Mr. Green, do you have the  
 15 document I gave you earlier that recites the Texas  
 16 League of Young Voters Education Fund's mission and  
 17 purpose?

18 A. Yes.

19 Q. After the sentence that says, Our organizing  
 20 and programming model can be categorized in the  
 21 following key areas, am I correct in stating that one  
 22 of those key areas is voter education and issue  
 23 advocacy?

24 A. That's correct.

25 Q. Okay. So am I correct in stating that voter

146

1 education is part of the mission of the Texas League?  
 2 A. Voter education?  
 3 Q. Yes.  
 4 A. Yes.  
 5 Q. And does voter education include educating  
 6 voters about existing voter laws?  
 7 A. I mean, to a certain extent.  
 8 Q. Okay.  
 9 A. I mean, but that's not our core -- when we --  
 10 when we say voter education.  
 11 Q. What is your core when you say voter  
 12 education?  
 13 A. Voter education is making sure that they know  
 14 their rights as a voter, you know, like when they go  
 15 to the polls, if they're turned away, stuff like that.  
 16 Q. So educating Texas League constituents about  
 17 existing voter laws is not part --  
 18 A. About existing voter laws?  
 19 MS. KORGAONKAR: Objection.  
 20 MR. TATUM: Sorry.  
 21 MS. KORGAONKAR: Mischaracterizes what  
 22 he said.  
 23 Q. (By Mr. Tatum) Okay. Is educating Texas  
 24 League constituents about existing voter laws not part  
 25 of the Texas League's mission?

147

1 A. I mean, it is part to a certain extent.  
 2 Q. Okay. Would you agree that the law as  
 3 enacted by SB 14 is an existing voter law?  
 4 A. Currently, on the books, yes.  
 5 Q. Okay. So by educating Texas League  
 6 constituents about the requirements of SB 14, is the  
 7 Texas League not fulfilling its mission to educate  
 8 voters about existing voter laws?  
 9 A. I mean, we are for that mission, but we don't  
 10 want it to, you know, overshadow, you know, our  
 11 critical work, which is, you know, voter registration,  
 12 Get Out the Vote. Now, when you start -- like us,  
 13 when we start getting to the point where, you know,  
 14 that's literally the majority of our time is educating  
 15 about, you know, a law that we think hinders our  
 16 population, then it's sort of, when you about it, a  
 17 deviation from, you know, our core activities.  
 18 Q. Can you tell me how many time-related  
 19 resources of the Texas League have been diverted  
 20 towards providing financial assistance and  
 21 transportation to young voters who lack the required  
 22 photo IDs and/or underlying documents, so that they  
 23 can acquire them where possible?  
 24 A. Okay. Well, I mean, as I said before, I know  
 25 there were several occasions where one of our staff

148

1 member did take a couple of our, I guess, constituency  
 2 to attain their -- their EIC. And as we know, gas is  
 3 a financial resource. And, you know, let's -- let's  
 4 be very clear that, you know, we did also educate and  
 5 pass out print material and print collateral, and all  
 6 those are financial resources, as well. You know,  
 7 cost of printing, you know, cost of design, all that,  
 8 you know, are, you know, budgetary items that are  
 9 needed to -- you know -- to make this happen.  
 10 Q. Can you tell me what amount of financial  
 11 resources have been diverted towards the purposes you  
 12 just described?  
 13 A. The amount? I don't know the exact amount.  
 14 Q. Does the Texas League believe that it has  
 15 been unable to fulfill its mission because of SB 14?  
 16 A. It has made it hard. I mean, it has put a  
 17 burden on the organization, yes.  
 18 Q. But has the -- does the Texas League -- I  
 19 don't believe you answered my question. Does the  
 20 Texas League believe -- or does it -- or does the --  
 21 is the Texas League taking a position -- let me start  
 22 over.  
 23 Does the Texas League take the position that  
 24 it has been unable to fulfill its stated mission  
 25 because of SB 14?

149

1 A. Yes.  
 2 Q. In what way has it been unable to fulfill its  
 3 stated mission because of SB 14?  
 4 A. I mean, as I -- I mean, as I said before, you  
 5 know, one of our key components -- I mean, one of our  
 6 key, you know, areas is to get, you know, new people,  
 7 you know, registered and out to vote.  
 8 Like I said, now, we're basically, you know,  
 9 making sure that our existing base, which we thought  
 10 were secure, make sure that they know that -- you know  
 11 -- about -- about the new law. And if it impacts  
 12 them, make sure that they get the necessary documents.  
 13 So when it gets to a point where -- you  
 14 know -- rather than just registering voters or getting  
 15 them out to vote, where we're incorporating a  
 16 significant amount of time and energy, you know,  
 17 pretty much combating and educating them and making --  
 18 and walking them through -- walking them through, you  
 19 know, hand in hand, you know, getting them the  
 20 necessary forms of ID, then, I mean, that's a  
 21 significant amount of time that we're spending just  
 22 on, you know, SB 14 that we didn't have to before.  
 23 Q. You mentioned getting new people to register  
 24 to vote.  
 25 A. Uh-huh.

150

1 Q. Do you know, on average, prior to SB 14, how  
2 many new registered voters the Texas League was able  
3 to -- let me state that again.

4 Prior to SB 14, do you know, on average,  
5 average how many voters the Texas League helped  
6 register for the first time?

7 A. I mean, I don't know the exact number, but I  
8 know it's significantly higher than the amount we're  
9 registering now.

10 Q. Can you give me a ballpark percentage of how  
11 much lower it is now, as opposed to before SB 14?

12 A. I mean, I don't have that -- I mean, I don't  
13 -- I can't -- I mean, I -- I don't have information  
14 off the top of my head. I would have to. . .

15 Q. Does the Texas -- do you know how many -- or  
16 does the Texas League maintain that kind of  
17 information about how many new registered voters it  
18 has -- about how many voters it has helped -- let me  
19 start over.

20 Does the Texas League maintain information  
21 indicating how many voters it has helped register for  
22 the first time in a given year?

23 A. I mean, we have some information, but it's  
24 not -- I mean, it's not -- I mean, it's not -- I mean,  
25 I would say it's not categorized as, you know, these

152

1 know, VR -- I guess, what I mentioned before as  
2 tabling isn't as much as now, because we're now,  
3 basically, just making presentations and actually, you  
4 know, educating about this new law.

5 Q. And for the record, when you say "VR"?

6 A. Voter registration.

7 Q. Okay. Does the Texas League believe that any  
8 of its SB 14-related activities fall outside of the  
9 scope of the Texas League's mission?

10 A. I already answered that question.

11 Q. Okay. I don't believe -- I've asked -- I've  
12 asked you a lot of questions about the Texas League's  
13 mission today, especially with regard to SB 14, but I  
14 don't think I've asked this specific one.

15 A. Okay.

16 Q. So, if I may, I'll repeat it.

17 A. Uh-huh.

18 Q. Does the Texas League believe that any of its  
19 SB 14-related activities fall outside of the scope of  
20 its stated mission?

21 A. Of our core mission, yes.

22 Q. And what activities are those?

23 A. What, our core?

24 Q. What SB 14-related activities that the Texas  
25 League engages in fall outside of the scope of its

151

1 people we registered to vote. Right. Because we  
2 don't -- we -- because -- you know -- we don't -- you  
3 know -- possess that type of information.

4 Q. So when you say that you haven't been able  
5 to, for lack of a better word, get as many new  
6 registered voters while SB 14 is in effect --

7 A. Uh-huh.

8 Q. -- as opposed to before it was in effect --

9 A. Right.

10 Q. -- what is that statement based on?

11 A. Well, what I mean by that is that -- you  
12 know -- prior to SB 14 -- you know -- we -- you know  
13 -- we have the time and the resource to -- you know --  
14 to attend college campuses and strictly do -- you know  
15 -- voter registration now, after SB 14, you know,  
16 we're spending a lot of our time -- I mean, we're  
17 still doing VR, because that's -- like I say, that's  
18 one of our core missions.

19 But, now, some of the time is, you know, like  
20 I said, going to, you know, speak at events or, you  
21 know, making presentations. So a lot of our, I guess,  
22 staff and, you know, volunteers are -- are now sort of  
23 like in an educational phase, rather than just going  
24 out registering to vote.

25 I mean, so I know that the number of, you

153

1 core mission?

2 A. Well, I mean, as I said before, our core  
3 mission is voter registration and Get Out the Vote.  
4 It's not solely, you know, about making phone calls to  
5 ask people who we've registered and who voted last  
6 time if they have the ID to register -- you know -- to  
7 be able to register again.

8 I mean, our core mission is actually, you  
9 know, bringing new people into the process and, you  
10 know, getting them acclimated to electoral process,  
11 not -- not solely -- you know -- like I said, now, we  
12 are -- we have to go back to the people we registered  
13 before and actually calling them and making sure. So  
14 it's sort of like double work in some sense.

15 MR. TATUM: I think I've just got a few  
16 more questions here and then we're done.

17 MS. KORGAONKAR: Okay.

18 Q. (By Mr. Tatum) Mr. Green, have any Texas  
19 League constituents ever raised an allegation or  
20 concern relating to election crimes to the Texas  
21 League?

22 MS. KORGAONKAR: I just want to note for  
23 the record that we objected to that topic in the  
24 30(b)(6) notice, but you can answer the question.

25 A. I don't know. We don't -- I mean, that's not

154

1 our core mission. We don't focus on election crimes.  
 2 Q. (By Mr. Tatum) Do y'all focus on voter  
 3 fraud?  
 4 A. Do we focus on voter fraud? That's not what  
 5 our core mission is.  
 6 Q. So has the Texas League conducted any  
 7 calculations, reports, audits, estimates, projections,  
 8 or other analyses relating to election crimes or voter  
 9 fraud?  
 10 A. No.  
 11 Q. Mr. Green, to the best of your knowledge, has  
 12 the Texas League provided all documents responsive to  
 13 the Defendants request for production in this case  
 14 that were in the Texas League's possession, custody,  
 15 or control?  
 16 A. To the best of my knowledge, yes.  
 17 Q. Mr. Green, do you know a Mr. Yannis Banks?  
 18 A. Do I know him?  
 19 Q. Yes.  
 20 A. I've seen his name.  
 21 Q. Have you ever met or conferred with him about  
 22 anything?  
 23 MS. KORGAONKAR: Objection. Beyond the  
 24 scope, but you can answer that.  
 25 A. Yannis Banks, I know who he is. I haven't

156

1 to that.  
 2 A. Okay.  
 3 MR. TATUM: All right. Well, I have no  
 4 more questions for you and I pass the witness.  
 5 MS. KORGAONKAR: So we'll just take a  
 6 break right now and then reconvene.  
 7 MR. TATUM: Sure.  
 8 (Break.)  
 9 MS. KORGAONKAR: I'm ready to go back on  
 10 the record. We just have a couple of questions for  
 11 redirect.  
 12 MS. MILLER: Okay.  
 13 EXAMINATION  
 14 QUESTIONS BY MS. KORGAONKAR:  
 15 Q. Mr. Green, earlier you testified that when  
 16 you used the term "constituents" today, you've meant  
 17 people who have taken actions with the League, signed  
 18 petitions or signed pledge cards. Is that right?  
 19 A. That's correct.  
 20 Q. And you've also used the term "constituency  
 21 base." Is that right?  
 22 A. Correct.  
 23 Q. And is it correct that that doesn't  
 24 necessarily mean people who have taken an action with  
 25 the League or signed a petition or anything like that?

155

1 spoken to him about anything.  
 2 MR. TATUM: Okay. Could we go off the  
 3 record real quick?  
 4 (Discussion off the record.)  
 5 MR. TATUM: Okay. Back on the record.  
 6 Q. (By Mr. Tatum) Okay. Mr. Green, we were  
 7 talking about this before, but we moved on after we  
 8 kind of got bogged down. I was asking you whether the  
 9 Texas League believes that the legislature, in  
 10 enacting SB 14, departed from its normal legislative  
 11 procedures. That's what we were talking about.  
 12 So I'm going to ask again: Does the Texas  
 13 League believe that the Texas Legislature departed  
 14 from its normal legislative practices and procedures  
 15 in enacting SB 14?  
 16 A. I don't know.  
 17 Q. Well, I don't have anything else for you,  
 18 Mr. Green, now that we've come to this point.  
 19 A. Okay.  
 20 Q. And before I pass the witness, do you have  
 21 any -- anything you'd like to clarify or modify with  
 22 regard to any of your answers given today?  
 23 A. I'm trying to think.  
 24 Q. And you can think about it after we break.  
 25 And if they ask you any questions, you can come back

157

1 A. Yes, that's correct.  
 2 Q. Does constituency base, the way that you've  
 3 used today, mean the League's target demographic?  
 4 A. Right, our target population.  
 5 Q. What is a target population?  
 6 A. Eighteen to thirty-five-year-olds,  
 7 particularly young people of color.  
 8 Q. I'd like to just draw your attention back to  
 9 Exhibit, I believe it was 3, the list.  
 10 A. Oh, is this it? (Indicating.)  
 11 Q. This one, yes.  
 12 A. Okay.  
 13 Q. Earlier, you testified that that document is  
 14 a partial list of constituents. Is that right?  
 15 A. Correct.  
 16 Q. Does the League represent the interests of  
 17 constituents in this lawsuit?  
 18 A. Yes.  
 19 MS. KORGAONKAR: If we could just go off  
 20 the record for one moment?  
 21 (Discussion off the record.)  
 22 MS. KORGAONKAR: Okay. Those are all  
 23 the questions that we have.  
 24 THE WITNESS: Okay.  
 25 MS. KORGAONKAR: Does DOJ have any

158

1 questions.  
 2 MS. MILLER: No questions from the  
 3 United States.  
 4 MR. TATUM: Okay. And I have nothing  
 5 further. With that, I believe we can go off record.  
 6 Mr. Green, thank you.  
 7 THE WITNESS: Thank you.  
 8 MS. KORGAONKAR: Thank you.  
 9 (Deposition concluded at 3:46 p.m.)  
 10 (Signature requested.)  
 11 \* \* \* \* \*

160

1 I, BLAKE EARL GREEN, have read the foregoing  
 2 deposition and hereby affix my signature that same is  
 3 true and correct, except as noted above.  
 4  
 5  
 6 BLAKE EARL GREEN  
 7  
 8 THE STATE OF \_\_\_\_\_  
 9 COUNTY OF \_\_\_\_\_  
 10 Before me, \_\_\_\_\_, on this  
 11 day personally appeared BLAKE EARL GREEN, known to me  
 12 (or proved to me under oath or through  
 13 \_\_\_\_\_) (description of identity  
 14 card or other document) to be the person whose name is  
 15 subscribed to the foregoing instrument and  
 16 acknowledged to me that they executed the same for the  
 17 purposes and consideration therein expressed.  
 18 Given under my hand and seal of office this  
 19 \_\_\_\_\_ day of \_\_\_\_\_,  
 20 \_\_\_\_\_.  
 21  
 22 NOTARY PUBLIC IN AND FOR  
 23 THE STATE OF \_\_\_\_\_  
 24 COMMISSION EXPIRES: \_\_\_\_\_  
 25

159

1 CHANGES AND SIGNATURE  
 2 WITNESS NAME: BLAKE EARL GREEN  
 3 DATE OF DEPOSITION: JUNE 18, 2014  
 4 PAGE/LINE CHANGE REASON

1 THE STATE OF TEXAS:  
 2 COUNTY OF FT. BEND:  
 3  
 4 I, Tamara Vinson, a Certified Shorthand  
 5 Reporter and Notary Public in and for the State of  
 6 Texas, do hereby certify that the facts as stated by  
 7 me in the caption hereto are true; that the above and  
 8 foregoing answers of the witness, BLAKE EARL GREEN, to  
 9 the interrogatories as indicated were made before me  
 10 by the said witness after being first duly sworn to  
 11 testify the truth, and same were reduced to  
 12 typewriting under my direction; that the above and  
 13 foregoing deposition as set forth in typewriting is a  
 14 full, true, and correct transcript of the proceedings  
 15 had at the time of taking of said deposition.  
 16 I further certify that I am not, in any  
 17 capacity, a regular employee of the party in whose  
 18 behalf this deposition is taken, nor in the regular  
 19 employ of his attorney; and I certify that I am not  
 20 interested in the cause, nor of kin or counsel to  
 21 either of the parties.  
 22  
 23 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on  
 24 this, the \_\_\_\_ day of June, 2014.  
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<hr/> <p style="text-align: center;">\$</p> <hr/> <p><b>\$22</b> 74:21</p> <p><b>\$25,000</b> 139:7</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p><b>00000900</b> 30:19</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p><b>1</b> 21:20,22 22:18 99:9 136:21</p> <p><b>1</b>..... .....<b>21</b> 8:2</p> <p><b>10</b> 99:9 100:5,13 101:4 135:23,25</p> <p><b>10</b>..... .....<b>135</b> 8:23</p> <p><b>10:03</b> 4:10</p> <p><b>10:57</b> 49:24</p> <p><b>10006-1738</b> 5:11</p> <p><b>101</b> 161:20</p> <p><b>12</b> 70:20</p> <p><b>12-31-2014</b> 161:19</p> <p><b>12548</b> 5:23</p> <p><b>14</b> 45:8 46:9,12,15,17,20,21 47:7,12,19 48:3 53:23 54:6,8,23 55:2,7,15,21,22 57:2 60:9,13,22 69:6 70:4,22 71:10,15,23 72:1,17 73:15,17 74:8 75:1,24 76:8 77:2 82:20 84:17 85:13 86:4,13,20 87:16,23 88:22 89:8,16 90:2,10,16,23 91:2,6 92:11,22 93:2,12,18 94:6,8,10 96:3,8,15 97:4,5,11,22,23 98:4,24 99:13,21 100:20 101:24 102:1,9 103:4,11,16,25</p>	<p>104:16 105:7,15,23 108:21 114:8,24 115:4,22 125:1,16,23 126:7,23 127:4,11,16 128:16,21,23 129:12 131:15 132:6,13 133:5,25 134:4,16 135:18 139:25 140:6 141:25 142:9,16,24 143:5,6,7,23 147:3,6 148:15,25 149:3,22 150:1,4,11 151:6,12,15 152:13 155:10,15</p> <p><b>14-related</b> 54:15 131:2,17 152:8,19,24</p> <p><b>14th</b> 61:13 87:13 88:17,24 89:3,6</p> <p><b>15th</b> 59:3</p> <p><b>18</b> 4:4 159:3</p> <p><b>1-800</b> 40:10</p> <p><b>1875</b> 5:5</p> <p><b>18th</b> 4:9</p> <p><b>1983</b> 12:17</p> <p><b>1st</b> 93:13</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p><b>2</b> 25:14,16 136:22</p> <p><b>2</b>..... .....<b>25</b> 8:5</p> <p><b>2:13-CV-193</b> 1:4</p> <p><b>2:13-CV-263</b> 2:2</p> <p><b>2:13-CV-291</b> 3:2</p> <p><b>2:13-CV-348</b> 3:13</p> <p><b>20</b> 85:18</p> <p><b>20006</b> 5:6</p> <p><b>2004</b> 44:4 45:1,3,4,11,15,23 46:8,15,19,23 47:18</p> <p><b>2006</b> 42:16 43:10</p> <p><b>2007</b> 43:13</p>	<p><b>2008</b> 13:22</p> <p><b>2010</b> 14:12 15:9,10 24:24 25:7 55:9,12</p> <p><b>2011</b> 8:18,20,22 81:16 82:19 83:24 98:18,23 99:21 115:4,12,21 116:14 117:18 120:6 121:14,22 122:16</p> <p><b>2012</b> 93:13,19,20,22,25 135:21 137:19,21 138:4 140:15</p> <p><b>2013</b> 57:23 61:13 86:2,10,15 87:13 88:17,24 89:3,6 135:21 140:3</p> <p><b>2014</b> 4:4,10 135:22 159:3 161:13</p> <p><b>202.307.3961</b> 5:18</p> <p><b>202.514.2919</b> 5:18</p> <p><b>202.663.6006</b> 5:6</p> <p><b>202.663.6363</b> 5:6</p> <p><b>212.226.7592</b> 5:11</p> <p><b>212.965.7712</b> 5:11</p> <p><b>22</b> 99:8,9 100:12</p> <p><b>24</b> 23:20,24 24:4 94:13,20 95:10,16</p> <p><b>25</b> 38:21</p> <p><b>26</b> 86:1,15</p> <p><b>26th</b> 86:10</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p><b>3</b> 23:7,23 24:4 30:13,15 157:9</p> <p><b>3</b>..... .....<b>30</b> 8:7</p> <p><b>3:46</b> 4:10 158:9</p> <p><b>30</b> 126:22 130:1</p> <p><b>30(b) (6</b> 18:22 21:7 125:4 153:24</p>
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<p><b>3015</b> 161:18</p> <p><b>31</b> 22:18 132:7 133:22</p> <p><b>3100</b> 4:13 161:20</p> <p><b>320-8690</b> 161:21</p> <hr/> <p>4</p> <hr/> <p><b>4</b> 56:2,4 70:18</p> <p><b>4</b>.....</p> <p>.....<b>56</b> 8:9</p> <p><b>40</b> 5:10</p> <hr/> <p>5</p> <hr/> <p><b>5</b> 8:15 22:12,14</p> <p>61:1,3 81:7,20,22</p> <p>98:11 109:16</p> <p><b>5</b>.....</p> <p>.....<b>61</b> 8:11</p> <p><b>512</b> 161:21</p> <p><b>512.463.2110</b> 5:24</p> <p><b>512.472.6538</b> 5:24</p> <p><b>528</b> 161:20</p> <p><b>58</b> 122:23</p> <p><b>5th</b> 5:10</p> <hr/> <p>6</p> <hr/> <p><b>6</b> 23:7,23 24:4</p> <p>80:23,25 126:19</p> <p>130:1 132:7</p> <p><b>6</b>.....</p> <p>.....<b>80</b> 8:15</p> <p><b>63</b> 121:4,24</p> <p><b>68</b> 121:10,25</p> <hr/> <p>7</p> <hr/> <p><b>7</b> 57:23 116:6,8</p> <p><b>7,00</b> 32:6</p> <p><b>7,000</b> 30:23</p> <p><b>7</b>.....</p> <p>.....<b>116</b> 8:17</p> <p><b>70</b> 123:3</p>	<p><b>75</b> 115:23 118:11</p> <p>119:3</p> <p><b>77004</b> 4:14</p> <p><b>78711-2548</b> 5:24</p> <p><b>78748</b> 161:21</p> <p><b>7th</b> 58:15</p> <hr/> <p>8</p> <hr/> <p><b>8</b> 119:10,12</p> <p><b>8</b>.....</p> <p>.....<b>119</b> 8:19</p> <p><b>8th</b> 81:16 82:19</p> <hr/> <p>9</p> <hr/> <p><b>9</b> 122:7,9</p> <p><b>9</b>.....</p> <p>.....<b>122</b> 8:21</p> <hr/> <p>A</p> <hr/> <p><b>A&amp;M</b> 82:13 83:13</p> <p><b>a.m</b> 4:10</p> <p><b>ability</b> 12:5</p> <p><b>able</b> 72:7,9 75:17</p> <p>85:12 91:7,16 92:19</p> <p>101:11 104:4 105:20</p> <p>110:9 116:23 129:15</p> <p>135:18 150:2 151:4</p> <p>153:7</p> <p><b>above-styled</b> 4:9</p> <p><b>abridges</b> 75:2</p> <p><b>Absolutely</b> 101:20</p> <p><b>acceptable</b></p> <p>71:10,15,25 72:16</p> <p>73:17 74:7 75:24</p> <p>76:8 77:2 86:4,13,19</p> <p>87:16,22 88:21</p> <p>89:8,16</p> <p>90:2,10,16,23 91:2,6</p> <p>127:3</p> <p><b>Access</b> 8:23</p> <p><b>acclimated</b> 153:10</p>	<p><b>according</b> 115:19</p> <p>121:23 122:2</p> <p>125:1,12,16,23</p> <p><b>account</b> 35:9 75:2,4</p> <p>86:3,12,18 87:15,21</p> <p>88:20 89:7</p> <p><b>accumulate</b> 29:24</p> <p><b>accurate</b> 10:24 12:1,5</p> <p>61:13 65:14 71:1</p> <p>82:16 100:21,24</p> <p>120:17</p> <p><b>accurately</b> 12:9 101:3</p> <p><b>acknowledged</b> 62:7</p> <p>160:12</p> <p><b>acquire</b> 147:23</p> <p><b>across</b> 65:2,3,18</p> <p>66:15,24 67:3</p> <p>68:5,16 72:5,9</p> <p>106:11</p> <p><b>act</b> 8:16 111:15</p> <p><b>acted</b> 97:22 98:3</p> <p>99:1,20 103:3,25</p> <p>104:16</p> <p><b>action</b> 1:3 2:1 3:1,12</p> <p>28:20 29:9,10,12</p> <p>31:25 32:10 52:23,24</p> <p>53:2 156:24</p> <p><b>actions</b> 156:17</p> <p><b>actively</b> 29:18,24</p> <p>64:16,22 65:1,24</p> <p>66:3,9</p> <p><b>activities</b> 17:13</p> <p>27:24,25 28:2</p> <p>37:13,14,17</p> <p>38:8,11,13</p> <p>39:1,4,8,15,19</p> <p>41:2,12 43:16</p> <p>44:3,24 45:1,7,20,21</p> <p>47:13,20 48:7,10</p> <p>50:5,8,17,21</p> <p>51:11,13 52:9 53:22</p> <p>54:15 131:2,17,22</p> <p>133:23 138:6,10</p> <p>139:3,8,10 140:9</p>
--	---	--

<p>141:25 147:17 152:8,19,22,24</p> <p><b>activity</b> 48:17 51:7 62:20</p> <p><b>acts</b> 111:15</p> <p><b>actual</b> 83:13,16</p> <p><b>actually</b> 27:20 34:2 47:17 53:8,9,10 66:7 70:11 72:11 74:19,20 80:11 98:15 101:16 108:23 129:18 135:4 140:2,16,18 152:3 153:8,13</p> <p><b>add</b> 129:16</p> <p><b>added</b> 31:16</p> <p><b>addition</b> 44:12 94:11</p> <p><b>adequately</b> 34:12</p> <p><b>advertising</b> 39:13</p> <p><b>advocacy</b> 38:6 41:18 145:23</p> <p><b>advocacy-related</b> 49:16</p> <p><b>affect</b> 12:5 35:1 43:18 48:1 96:11 105:14 129:2</p> <p><b>affected</b> 23:20 34:3,18 75:15 96:11,14 129:4,5,6</p> <p><b>affecting</b> 18:8</p> <p><b>affective</b> 96:11</p> <p><b>affects</b> 42:3 43:21 76:15</p> <p><b>affidavit</b> 113:15</p> <p><b>affiliate</b> 25:10</p> <p><b>affiliates</b> 48:22,25 49:4</p> <p><b>affiliate-wide</b> 49:6</p> <p><b>affirm</b> 113:16</p> <p><b>affirmatively</b> 142:5</p> <p><b>affix</b> 160:1</p>	<p><b>afford</b> 72:9</p> <p><b>African</b> 72:6 74:4 75:13,20 106:9 120:11,24 121:12,21,24</p> <p><b>age</b> 32:12,20</p> <p><b>agency</b> 41:10</p> <p><b>ages</b> 29:25</p> <p><b>ago</b> 22:8 65:17</p> <p><b>agreed</b> 115:23</p> <p><b>ahead</b> 17:11 49:19 98:12 103:20 105:4 117:7 142:12</p> <p><b>allegation</b> 71:2 129:25 153:19</p> <p><b>alleged</b> 103:9</p> <p><b>alleges</b> 69:2 70:2,20</p> <p><b>alleging</b> 101:21</p> <p><b>allocate</b> 140:19</p> <p><b>allocation</b> 17:15 27:14</p> <p><b>allocations</b> 141:15</p> <p><b>allowed</b> 106:15 115:25 116:18 118:3 119:7 120:13 121:2,8 122:2,21 123:2</p> <p><b>alone</b> 82:13</p> <p><b>already</b> 9:15 18:7 21:13,23 24:17 28:15 32:2 152:10</p> <p><b>am</b> 34:10 91:25 130:13 145:21,25 161:9,10</p> <p><b>amended</b> 8:3,12 61:9 63:23 68:18,21 87:12,24 88:16 89:3 99:7,11 101:20 126:14</p> <p><b>amendments</b> 102:13 103:12 104:23</p> <p><b>America</b> 2:1 5:14 34:5,6 35:4</p>	<p><b>American</b> 1:8 3:2 34:7 106:10</p> <p><b>Americans</b> 72:6 74:4 75:13,20 120:11,24 121:12,21,24</p> <p><b>among</b> 132:11 133:3,24 134:14</p> <p><b>amongst</b> 115:3 119:16</p> <p><b>amount</b> 55:13 107:22 123:6 134:13,17,20 135:3 139:1,6,7 140:9 148:10,13 149:16,21 150:8</p> <p><b>amounts</b> 74:9</p> <p><b>analyses</b> 60:21 73:5,23 154:8</p> <p><b>analysis</b> 106:5</p> <p><b>and/or</b> 147:22</p> <p><b>Angela</b> 5:15 10:2</p> <p><b>angela.miller5@usdoj.gov</b> 5:18</p> <p><b>ANNA</b> 1:4</p> <p><b>annual</b> 27:17 141:8</p> <p><b>answer</b> 10:22 11:14,16,19 13:2 18:24 19:5 20:8,10 27:2,21 28:9 32:18 33:13 34:15 35:14,18 47:2 58:7 64:20 69:15 70:6 84:13,19 88:3 95:17 100:7 101:11 102:4 110:8 112:7 113:8 123:13 124:21 125:10 128:8 134:19 137:8 144:22 153:24 154:24</p> <p><b>answered</b> 102:22 114:15 128:8 144:21 148:19 152:10</p> <p><b>answering</b> 12:9 109:7 133:12,13</p> <p><b>answers</b> 10:16 12:2,6 22:23 24:11 155:22</p>
---	---	--

161:4	<b>assistance</b> 147:20	34:4,8,10 44:16,19
<b>anyone</b> 16:14,15,17	<b>Assistant</b> 5:22	47:9 48:5 50:7 61:16
20:20 36:14 51:22	<b>assisted</b> 71:5,9,13	64:7,12 115:19 116:4
52:1,5 64:17,23	<b>assisting</b> 50:18 52:10	143:3 144:12
65:10 77:8 82:23	<b>assists</b> 67:19	<b>away</b> 126:25 146:15
83:7 85:10 92:12	<b>ASSOCIATION</b> 2:7	<hr/>
123:11	<b>assume</b> 66:12 83:24	<hr/> B <hr/>
<b>anything</b> 12:8 21:12	134:2	<b>background</b> 12:13
31:9 41:24 43:20	<b>assumes</b> 116:3	<b>backtrack</b> 50:4
50:12 54:6 102:19	<b>attached</b> 4:16	<b>ballot</b> 8:24 111:23
108:20 130:8	<b>attain</b> 13:12 148:2	112:12
143:17,20 144:11	<b>attempt</b> 79:10,13,24	<b>ballpark</b> 150:10
154:22 155:1,17,21	80:14 113:5,11,21	<b>Banks</b> 154:17,25
156:25	<b>attempted</b> 33:10	<b>barriers</b> 107:6
<b>anyway</b> 79:23 105:5	71:9,14 78:25 79:1,6	<b>base</b> 28:18 40:17
<b>appear</b> 57:8,11 62:11	90:9,15,22	44:15 52:25 54:5,21
<b>Appearances</b> .....	91:1,4,5,7,9	67:4 80:9 89:19
.....	<b>attempting</b> 106:20	90:20 115:15
....5-6 7:3	107:1,13,18 108:11	127:2,14,15
<b>appeared</b> 160:9	<b>attempts</b> 80:7 90:19	129:3,10,19 132:3
<b>Appearing</b> 5:15	91:15	135:7,21 143:18
<b>appears</b> 137:1	<b>attend</b> 13:7,10 58:14	149:9 156:21 157:2
<b>appreciate</b> 111:8	59:6 131:25 151:14	<b>based</b> 15:14 57:10
112:7	<b>attending</b> 29:6	72:3,4 73:4,22
<b>approach</b> 65:16	<b>attention</b> 157:8	74:11,12 75:8
<b>approached</b> 65:9	<b>attorney</b> 5:16,22 9:6	97:14,15 98:6,7
<b>area</b> 31:21 59:24	11:13,15 32:17	101:7 104:21 105:17
<b>areas</b> 38:4 145:21,22	133:12 161:10	106:4 121:17 124:25
149:6	<b>attorneys</b> 35:16 40:13	127:6,7 139:20
<b>argued</b> 74:22	<b>audience</b> 80:10	151:10
<b>Arianna</b> 16:24 67:17	<b>audits</b> 60:20 154:7	<b>bases</b> 28:4 58:21
79:12,23 80:5	<b>August</b> 86:1,10,15	<b>basically</b> 57:3 129:18
<b>articles</b> 73:25	<b>Aurica</b> 2:4 5:3 8:13	149:8 152:3
<b>aside</b> 53:24 141:21	61:11,18 63:3,6,10	<b>basis</b> 16:12 18:15
<b>as-needed-type</b> 141:18	<b>Austin</b> 5:24 161:21	27:17 73:19 101:24
<b>aspects</b> 131:10	<b>available</b> 68:12	102:6 103:14 138:15
<b>assessing</b> 132:11	<b>Avenue</b> 5:5	141:18 142:16
133:3,24 134:14	<b>average</b> 150:1,4,5	<b>Bates</b> 30:16,18 57:10
<b>assist</b> 15:19,23 41:11	<b>aware</b> 19:6 22:21 24:9	<b>Bear</b> 99:6
71:5,9,14		<b>became</b> 93:2,12
		<b>become</b> 30:2 93:16
		<b>becomes</b> 29:1,2,4 32:1

<p><b>begin</b> 10:22</p> <p><b>behalf</b> 9:18,21 18:23 22:23 24:11 32:23 123:10 161:10</p> <p><b>behind</b> 136:6</p> <p><b>belief</b> 73:20,22 74:11 75:8 97:14 98:6 104:21 105:17 106:4 127:6</p> <p><b>believe</b> 15:24 19:2 20:19 30:23 35:6,7 37:25 42:16 58:15 63:21 67:2 73:14 74:8 75:1,22 76:6 79:15,21 80:22 81:8 85:8 92:11,16 93:16,19 97:11,21 98:2,14,25 99:19 103:3,14,25 104:15 105:6,12,24 106:19,25 107:8,10,15,25 108:3,8,12,14,24 110:3,21,25 111:19,21 114:1,8,13 115:11 118:23 123:21 124:4,12,19 125:15,22 126:8,23 127:22 128:3,14 148:14,19,20 152:7,11,18 155:13 157:9 158:5</p> <p><b>believes</b> 101:25 102:7 124:1,2 155:9</p> <p><b>BELINDA</b> 3:12</p> <p><b>BENAVIDES</b> 2:9</p> <p><b>BEND</b> 161:1</p> <p><b>beneficial</b> 34:19</p> <p><b>BENJAMIN</b> 1:7</p> <p><b>besides</b> 18:6 20:21 27:13 54:7 77:8</p> <p><b>Bessiake</b> 2:5 5:3 8:14 61:12,19 64:13 69:4,8,12,24</p>	<p><b>best</b> 11:3 49:7 154:11,16</p> <p><b>bet</b> 110:16</p> <p><b>better</b> 35:3 102:18 132:2 151:5</p> <p><b>beyond</b> 27:20 28:9 53:18 58:5 154:23</p> <p><b>bill</b> 47:25 48:1 55:22 99:2 102:18 126:1 136:16 143:8</p> <p><b>bills</b> 54:24,25 55:6</p> <p><b>bill's</b> 99:17</p> <p><b>binding</b> 22:23 24:11</p> <p><b>birth</b> 74:17</p> <p><b>bit</b> 33:9 37:13 50:4,19</p> <p><b>black</b> 71:24 73:15</p> <p><b>Blake</b> 4:3,6 7:5 9:1,10 69:14 159:2 160:1,5,9 161:4</p> <p><b>B-L-A-K-E</b> 9:10</p> <p><b>blasts</b> 46:22</p> <p><b>board</b> 72:6,9 106:11</p> <p><b>bogged</b> 155:8</p> <p><b>books</b> 108:22 126:7 147:4</p> <p><b>born</b> 12:14,16</p> <p><b>bottom</b> 22:16 30:16 81:22 138:17 139:6</p> <p><b>box</b> 5:23 136:4,7,10</p> <p><b>BRANCHES</b> 3:1</p> <p><b>break</b> 45:17 49:9,20,25 85:18 86:6 92:3,9 95:25 96:22 111:10 155:24 156:6,8</p> <p><b>BRICKNER</b> 1:7</p> <p><b>bring</b> 21:9 56:6</p> <p><b>bringing</b> 153:9</p>	<p><b>broken</b> 119:16</p> <p><b>brothers</b> 12:25</p> <p><b>brought</b> 25:3</p> <p><b>budget</b> 18:13 138:18 139:20 140:19 141:9,11,13,16</p> <p><b>budgetary</b> 137:2 139:14 148:8</p> <p><b>budgeting</b> 17:14</p> <p><b>bullet</b> 83:3</p> <p><b>bunch</b> 45:6</p> <p><b>burden</b> 33:5,7 54:4 71:24 73:15 74:2,4 75:18 81:9 97:19 106:13 115:17 148:17</p> <p><b>burdens</b> 97:18 109:1</p> <p><b>BURNS</b> 1:5</p> <p><b>Business</b> 13:14</p> <hr/> <p style="text-align: center;">C</p> <hr/> <p><b>calculations</b> 154:7</p> <p><b>California</b> 76:18,20 77:12,17</p> <p><b>campaign</b> 44:6,7 56:21,24 136:22 137:5,12,17,22 138:11,13 139:12,24 142:7,21 143:2,9,12</p> <p><b>campaigns</b> 46:7 134:23</p> <p><b>campus</b> 51:1</p> <p><b>campuses</b> 38:17,18,22 76:13 135:5 151:14</p> <p><b>candidate</b> 112:17,23</p> <p><b>capacity</b> 2:13,15 3:7,8,19,21 17:16,17 124:9 161:9</p> <p><b>caption</b> 161:4</p> <p><b>card</b> 28:21 29:7 78:14 84:9 160:11</p> <p><b>cards</b> 156:18</p>
--	--	--



<b>CARRIER</b> 1:4	<b>Christina</b> 16:9 17:23	56:15,17,20,22,23
<b>carries</b> 101:10	<b>cites</b> 99:10	57:1 59:16,17,20
<b>carry</b> 39:8	<b>cities</b> 99:11	60:2,13
<b>carrying</b> 38:10	<b>citing</b> 54:3 101:21	<b>co-hosted</b> 44:11
<b>case</b> 1:5 2:3 3:3,13	<b>citizens</b> 1:8 115:3,11	<b>co-hosting</b> 44:12
20:10 63:7 69:22	125:2,17,24	<b>collaborate</b> 49:4
86:10 87:12 88:17	126:3,4,5,9,10,12	<b>collaborating</b> 58:2
125:13 142:11 154:13	<b>citizenship</b> 72:22	<b>collaboration</b> 139:10
<b>cases</b> 41:15	74:19 78:18	<b>collaborations</b> 39:21
<b>casting</b> 108:1	<b>city</b> 59:11	<b>collateral</b> 39:13 51:9
<b>categorized</b> 38:4	<b>civic</b> 26:21	54:18 148:5
145:20 150:25	<b>civil</b> 1:3 2:1 3:1,12	<b>collected</b> 83:22,25
<b>CAUCUS</b> 3:2	4:14 5:17 111:16	<b>college</b> 51:1 76:13
<b>cause</b> 4:9 161:11	<b>Claim</b> 99:8	105:25 129:4 135:5
<b>caution</b> 20:7 35:14	<b>clarification</b> 88:10	151:14
36:1 69:15	<b>clarify</b> 42:12 62:3	<b>colleges</b> 44:8 46:13
<b>Center</b> 12:24 59:10	63:5 66:20 69:8	<b>color</b> 33:7 71:24
<b>central</b> 34:23	83:10 88:14 93:8	115:18 127:1 134:24
<b>certain</b> 27:25 33:5	94:12,16 99:4 123:25	157:7
35:1 103:12 108:23	155:21	<b>colors</b> 73:16
138:22 146:7 147:1	<b>clarity</b> 34:17,22	<b>combating</b> 132:6
<b>certificate</b> 72:22,25	<b>Clark</b> 2:4 5:3 8:13	149:17
74:18 78:18	61:11,17	<b>combination</b> 131:4
<b>Certificate</b> .....	62:14,19,21,24,25	<b>comes</b> 99:14
.....161 7:9	69:3 70:2,21 71:5,9	<b>comment</b> 8:15 54:2,7
<b>Certified</b> 161:2	77:5,9,17	81:5,10 82:18 84:9
<b>certify</b> 161:3,9,10	<b>Clark's</b> 62:2 70:21	<b>COMMISSION</b> 160:18
<b>cetera</b> 134:6	<b>clean</b> 10:18	<b>COMMISSIONERS</b> 2:8
<b>challenges</b> 41:15	<b>clear</b> 94:17,21 98:20	<b>committed</b> 111:15
109:1	103:7 118:12 120:15	<b>committee</b> 5:23
<b>chance</b> 109:24	124:10 148:4	18:2,3,5
<b>CHANGE</b> 159:4	<b>clearly</b> 11:7 39:5	<b>communicate</b> 38:12
<b>CHANGES</b> 159:1	105:2	132:2
<b>characterization</b>	<b>Cleburne</b> 4:13	<b>communities</b> 33:7
116:22	<b>clinic</b> 44:13 60:5	75:20
<b>charge</b> 16:16	<b>clinics</b> 45:12 46:19	<b>community</b> 44:11 46:18
<b>check</b> 79:21	60:7,12	51:1,19 59:4,10,13
<b>CHRISTI</b> 1:2	<b>Club</b> 76:18,20	60:6
	77:12,17	<b>compared</b> 72:8 94:9
	<b>coalition</b> 8:10 44:5	106:11
	47:23,24	

<b>compiled</b> 120:4 <b>compiles</b> 31:12 <b>compiling</b> 31:13 <b>complaint</b> 8:12 61:9 63:18,22 68:18,21 69:2 70:2,5,19,20 86:1,9 87:12,25 88:17 89:3 99:7,11 101:21 103:10 126:14 130:1 133:21 <b>completely</b> 93:13 <b>Complying</b> 22:13 68:23 109:17,23 126:20 <b>component</b> 131:15 141:5 <b>components</b> 40:2 149:5 <b>compound</b> 45:17 46:1,25 64:3 108:5 115:6 137:7 <b>comprehensive</b> 136:22,23 137:4,5,12,17,25 139:9,12,13,24 140:4 142:7,21 143:1,9,11 <b>comprise</b> 18:1 <b>concealed</b> 72:23 78:6,7 134:5 <b>concern</b> 153:20 <b>concerns</b> 123:22 124:6,14 <b>concluded</b> 158:9 <b>conclusion</b> 32:17 33:1,13,20 34:15,18 97:9 101:9 102:3 103:6 <b>conduct</b> 27:23 39:14,19 43:23,25 49:15 141:8 <b>conducted</b> 46:7 60:19 115:20 116:12 117:17 120:6 122:15 154:6 <b>conducts</b> 37:17 50:8	<b>confer</b> 20:20 <b>Conference</b> 3:1 4:13 <b>conferred</b> 154:21 <b>confirm</b> 24:1 50:16 60:19 95:9,20 116:14 <b>confused</b> 66:19 <b>confusing</b> 45:18 86:6 144:1 <b>confusion</b> 136:15 <b>Conley</b> 5:4 9:20 10:9 56:8 70:8,13,15,17 76:3 83:1 84:10 85:21 88:2,6,9 95:13,16 99:22,25 100:4,9,23 101:2 102:10,21 110:14,17 115:7 117:1,6,10,13 120:15 <b>connection</b> 39:15,18 43:20 45:14 <b>consecutive</b> 57:8 <b>consideration</b> 42:2 99:17 160:12 <b>considered</b> 98:24 115:4 <b>considering</b> 123:23 124:7,15 <b>Consolidated</b> 2:3 3:3,13 <b>constituencies</b> 79:9 <b>constituency</b> 8:8 31:11 32:8,9 43:18,21 52:25 54:5 67:4 75:25 76:7 80:9 115:15 127:15 132:12 133:4,24 134:15 135:7 148:1 156:20 157:2 <b>constituent</b> 28:18 29:1,2,4 32:2 40:17 44:15 54:21 62:14 67:4,23 79:5 80:18 85:25 86:11 87:14,17	89:13,18 90:9,11,15,20 96:2,7,10,13 114:17,19,23 129:3 132:3 <b>constituents</b> 28:23 29:16,19,24 30:6 32:15 33:10,17,25 38:12 51:22 52:1,4 54:11 55:5,14 64:17,23 65:10,25 66:12 67:7,11,15 68:2,3,5,15,17 71:14 75:23 77:21 78:2,6,11,14,18,21,2 5 79:22,24 94:7,23 95:22 123:8,17,22 124:6,14,17,20 127:23 128:4,15,20,22 143:22 144:6 146:16,24 147:6 153:19 156:16 157:14,17 <b>contacted</b> 67:22 68:1 <b>contain</b> 24:6 83:3 <b>contained</b> 22:24 24:12 121:17 <b>contains</b> 30:22 <b>contend</b> 33:24 34:11 71:23 97:5,8 115:2,6 <b>contention</b> 33:16 72:3 73:3,7,13 <b>contents</b> 20:9 35:15 36:5 69:16 116:24 <b>context</b> 100:1 <b>contingent</b> 142:16 <b>continue</b> 69:5 70:3 <b>control</b> 10:14 154:15 <b>conversation</b> 132:20 <b>conversations</b> 20:9 35:15 36:6 37:7 69:17
---	---	--

<p><b>copy</b> 21:24</p> <p><b>core</b> 126:25 127:8,23 128:5 131:6 132:5 143:13,16 144:10,12 146:9,11 147:17 151:18 152:21,23 153:1,2,8 154:1,5</p> <p><b>CORPUS</b> 1:2</p> <p><b>correct</b> 12:20 13:22 14:2 15:4,5 17:6,7,23,24 19:11 21:8 22:10,11,19,20 23:16 24:7,13 25:9,12 26:1,2,5,10 27:9,10 28:23,24,25 30:7,8 31:3,22 32:24 36:10,11 38:9 42:19 48:23,24 55:6,19 56:19,25 57:13,20,21,25 59:4,5 61:15,19,20 62:9,12 65:21,22 66:12 67:1,9 68:25 70:5 71:3 73:2,20,21 79:25 80:1 81:11,12,17,18 82:1,2,9,10,17,22 83:13,14,18 95:12,23 112:3 118:6 119:8 126:11 130:13,15 136:11,19,20,24,25 137:2,3 138:21 139:5,25 141:12 142:25 145:21,24,25 156:19,22,23 157:1,15 160:2 161:7</p> <p><b>correctly</b> 97:25</p> <p><b>corresponding</b> 138:22</p> <p><b>cost</b> 39:12 140:22 148:7</p> <p><b>costing</b> 140:17</p> <p><b>counsel</b> 10:5 19:9,10,21 20:5,10,17,21 23:6,9 35:25 36:10 69:17 117:9 161:11</p>	<p><b>counterfeit</b> 111:20,22 112:11</p> <p><b>counterparts</b> 106:12</p> <p><b>country</b> 26:22</p> <p><b>County</b> 1:9 2:8,9 98:9,10 160:8 161:1</p> <p><b>couple</b> 19:25 44:21 148:1 156:10</p> <p><b>course</b> 38:10 49:13 65:1 67:2 68:7,8,16 99:17</p> <p><b>court</b> 1:1 6:2 10:17,24 98:11</p> <p><b>court-rejected</b> 134:25</p> <p><b>cover</b> 43:13</p> <p><b>covers</b> 131:14</p> <p><b>created</b> 53:10 57:1,3</p> <p><b>creates</b> 71:24 73:15</p> <p><b>crimes</b> 153:20 154:1,8</p> <p><b>criminal</b> 111:16</p> <p><b>critical</b> 147:11</p> <p><b>critically</b> 135:20</p> <p><b>Crystal</b> 2:4 5:3 8:13 61:12,18 64:7</p> <p><b>CSR</b> 4:11 161:18</p> <p><b>current</b> 25:5 72:16 126:6</p> <p><b>currently</b> 14:16 15:3 107:21 147:4</p> <p><b>custody</b> 154:14</p> <p><b>cycle</b> 136:17</p> <p><b>cycles</b> 93:3</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p><b>daily</b> 16:12 18:15 131:6</p> <p><b>DALLAS</b> 1:9</p> <p><b>Danielle</b> 5:4 9:20 10:9</p>	<p><b>danielle.conley@wilme rhale.com</b> 5:7</p> <p><b>data</b> 31:17 118:8 120:1,4</p> <p><b>database</b> 53:5,6,10</p> <p><b>date</b> 86:11,18 88:20 159:3 161:19</p> <p><b>day</b> 17:8,10,12 20:12,14 44:18 47:8 108:11 135:12 160:9,13 161:13</p> <p><b>day's</b> 17:13</p> <p><b>DC</b> 5:6</p> <p><b>deal</b> 54:20</p> <p><b>deals</b> 41:24</p> <p><b>Dean's</b> 4:13</p> <p><b>deceptive</b> 111:15</p> <p><b>decides</b> 28:5,6</p> <p><b>decision</b> 28:11,12 35:11,20 37:2,10,11 66:8</p> <p><b>decisions</b> 17:15 18:7,9</p> <p><b>dedicated</b> 141:13 142:1</p> <p><b>Defendants</b> 1:14 2:17 3:11,23 4:8 5:20 8:3 25:19 56:11 70:23 81:1 134:24 136:1 154:13</p> <p><b>Defense</b> 9:18,24 81:13</p> <p><b>defined</b> 109:19 111:14</p> <p><b>definition</b> 109:21,25 111:8</p> <p><b>degree</b> 13:12,18 35:3 42:17</p> <p><b>DEL</b> 3:15</p> <p><b>DELEON</b> 1:4</p> <p><b>democrats</b> 122:18</p> <p><b>demographic</b> 157:3</p>
--	---	--

<p><b>demonstrating</b> 99:12 100:19 101:22</p> <p><b>denied</b> 82:13</p> <p><b>denies</b> 75:2</p> <p><b>deny</b> 81:6</p> <p><b>departed</b> 99:12 100:19 101:23,25 102:8 103:10,15 155:10,13</p> <p><b>Department</b> 2:16 3:9,22 5:17 10:2 34:8,19 35:5 54:3 79:15 81:6 142:13</p> <p><b>depicted</b> 140:10</p> <p><b>depicts</b> 119:15 120:22</p> <p><b>deposed</b> 10:11</p> <p><b>deposition</b> 4:2,6 8:3 10:14 14:20 19:8,22 20:2,22,25 21:5,13 22:7,9 95:11 109:12,20 158:9 159:3 160:1 161:7,8,10</p> <p><b>deputy</b> 15:7,17 17:9,19</p> <p><b>describe</b> 17:8 35:21 37:16 44:2 48:6,10 50:20 51:13 52:8 53:21</p> <p><b>described</b> 29:16 40:19 44:25 45:21 57:22 73:19 106:1 137:17 138:1 139:12,14,15 141:17 148:12</p> <p><b>describes</b> 57:19</p> <p><b>description</b> 160:10</p> <p><b>design</b> 148:7</p> <p><b>designated</b> 22:22 24:10</p> <p><b>designed</b> 134:23</p> <p><b>desires</b> 125:24</p> <p><b>deter</b> 114:9</p>	<p><b>determine</b> 36:24 80:19 85:12</p> <p><b>deterred</b> 129:18</p> <p><b>deters</b> 114:8,12</p> <p><b>develop</b> 58:20</p> <p><b>developed</b> 44:6</p> <p><b>Development</b> 38:7</p> <p><b>deviation</b> 147:17</p> <p><b>devise</b> 141:8</p> <p><b>devoted</b> 38:25 39:4 54:14</p> <p><b>different</b> 19:24 38:18,22 51:20 75:14 111:17 119:16 128:13,21 132:1</p> <p><b>direct</b> 36:9 57:1</p> <p><b>direction</b> 161:6</p> <p><b>directly</b> 16:10 17:5 35:10 60:8 99:10 128:13</p> <p><b>director</b> 2:15 3:9,21 15:7,17,19 16:7 17:9,18,19,21,23 25:5 28:11 35:25 36:10 37:3,11 42:6 47:25 53:25 131:19,25</p> <p><b>disagree</b> 118:1</p> <p><b>discriminate</b> 104:17</p> <p><b>discriminated</b> 97:20</p> <p><b>discriminatory</b> 70:24 75:12 97:5,12,16 104:1,3 125:2,17,25</p> <p><b>discuss</b> 36:17,21 64:24 65:25</p> <p><b>discussed</b> 24:9 58:16,23</p> <p><b>discussing</b> 73:4 119:14</p> <p><b>Discussion</b> 155:4 157:21</p>	<p><b>disenfranchisement</b> 136:15</p> <p><b>disposal</b> 130:25</p> <p><b>disproportionately</b> 72:7 75:15</p> <p><b>disqualified</b> 113:22</p> <p><b>distinction</b> 94:25</p> <p><b>DISTRICT</b> 1:1</p> <p><b>divert</b> 126:24 131:2,12,13</p> <p><b>diverted</b> 127:12,19 131:8,17 132:5,11 133:3 134:13 141:25 147:19 148:11</p> <p><b>Division</b> 1:2 5:17</p> <p><b>divulging</b> 35:23</p> <p><b>document</b> 21:25 22:4,6 25:18,20,22 30:22 31:6,10 32:5 37:25 56:11 57:11 61:4,5,6,14 63:21,23 74:14 81:1,2,4 83:11 101:15 116:21,22 117:2,11 119:8,20,24 120:7,17,21 121:4,10 122:10,12,23 136:1,2,5,12 137:6,10,14,18 138:2 140:10 142:6,23 145:15 157:13 160:11</p> <p><b>documents</b> 20:24 21:2,3,9 56:12,14 62:12 72:10 78:21 134:2 147:22 149:12 154:12</p> <p><b>DOJ</b> 98:8 157:25</p> <p><b>donations</b> 27:9</p> <p><b>done</b> 11:1 45:13 153:16 155:8</p> <p><b>donor</b> 28:4</p> <p><b>donors</b> 26:14</p> <p><b>double</b> 153:14</p>
--	---	--

<p><b>dozens</b> 82:5</p> <p><b>DPS</b> 71:22 79:16</p> <p><b>drafting</b> 123:23 124:6,14</p> <p><b>draw</b> 157:8</p> <p><b>driver's</b> 72:20 76:21 77:21,24 134:4</p> <p><b>duly</b> 4:8 9:2 108:9 161:5</p> <p><b>during</b> 41:19 42:2 43:19 44:18 47:8 50:19 52:10,11 98:23 99:17,21 113:11 132:5 135:11,12</p> <p><b>duties</b> 15:16</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p><b>Earl</b> 4:3,6 7:5 9:1,10 159:2 160:1,5,9 161:4</p> <p><b>E-A-R-L</b> 9:11</p> <p><b>earlier</b> 28:6 47:2 55:4 56:24 60:18 66:23 67:17 117:17 145:15 156:15 157:13</p> <p><b>early</b> 44:18 47:8</p> <p><b>easier</b> 11:1</p> <p><b>economic</b> 72:5 75:16 106:11</p> <p><b>educate</b> 44:9 46:14 51:20,22 52:1 54:20 55:5 57:3 80:14 127:8,13 128:12,25 129:1 138:14 143:24 147:7 148:4</p> <p><b>educated</b> 54:11 71:18 80:16,18 91:13 131:9 143:20</p> <p><b>educating</b> 51:17 52:4 55:13,20,23 60:10 127:20,22,25 128:4,15,20,22 143:22 144:5,14</p>	<p>145:8,10 146:5,16,23 147:5,14 149:17 152:4</p> <p><b>education</b> 2:3 5:3 8:4,6,8,13 37:19 38:6 50:18 51:15,16 54:23,24 60:6 61:11 67:21 80:8 82:5 131:11,15,23 134:23 136:22 137:4,12,17,22 138:11 139:12,24 140:25 142:7,21 143:1,9,11,16 145:16,22 146:1,2,5,10,12,13</p> <p><b>educational</b> 9:24 44:7 46:7 91:14 131:24 151:23</p> <p><b>effect</b> 60:21 94:1 135:1 151:6,8</p> <p><b>effective</b> 93:2,9,12,13</p> <p><b>effectively</b> 82:7</p> <p><b>efficiency</b> 15:22</p> <p><b>EIC</b> 44:23 71:19,22 72:11 73:1,2 74:13,22,23 75:18 78:22,25 79:6,10,14,24 80:3,11,12,18 91:4,16 148:2</p> <p><b>eighteen</b> 30:1 31:21 32:12 157:6</p> <p><b>either</b> 28:19 29:4 31:18 64:15 131:10,11 132:23 138:9 161:11</p> <p><b>elected</b> 123:7,16,21 124:5,13,18</p> <p><b>election</b> 8:23 38:7 40:6,7,9,20,22 41:2,13 44:17 47:8 72:24 93:3,25 94:8 108:11 111:23</p>	<p>112:12,23 113:12,13,21 114:3,5 136:17,23 137:13 138:1,13 139:13 140:4 142:8,22 143:3,4 153:20 154:1,8</p> <p><b>elections</b> 50:19 52:10,11 94:9</p> <p><b>electoral</b> 128:11 129:1 153:10</p> <p><b>electronic</b> 31:19</p> <p><b>eligibility</b> 74:24</p> <p><b>eligible</b> 74:24 105:21 113:23,25 118:24 129:7</p> <p><b>else</b> 12:8 18:6 20:20 21:12 36:14 43:20 51:22 52:1,5 64:17,23 65:10 77:8 102:19 130:8 155:17</p> <p><b>e-mail</b> 46:22 57:19,23</p> <p><b>e-mails</b> 38:15</p> <p><b>employ</b> 161:10</p> <p><b>employed</b> 14:13,15,16 15:3</p> <p><b>employee</b> 161:9</p> <p><b>employment</b> 16:17</p> <p><b>enacted</b> 44:4 47:17 48:8 50:6 54:2 55:2 69:5 70:4 82:21 97:5,11,22 98:4,15 103:4 105:15 115:22 125:1,16,23 129:13 137:23 140:2 147:3</p> <p><b>enacting</b> 97:23 105:7 155:10,15</p> <p><b>enactment</b> 46:9,12,17,21 47:7,12,18 48:3 60:13 99:20 127:11</p> <p><b>encourage</b> 64:17 114:2,4</p>
--	---	--



<p><b>energy</b> 133:1 149:16</p> <p><b>engage</b> 41:17 47:13,20 48:17 51:10 128:10</p> <p><b>engaged</b> 44:25 45:22</p> <p><b>engagement</b> 67:21</p> <p><b>engages</b> 41:13 43:17 50:21 152:25</p> <p><b>ensure</b> 143:2</p> <p><b>ensuring</b> 135:20</p> <p><b>entail</b> 15:25 40:8 41:6</p> <p><b>ENTERO</b> 3:16</p> <p><b>entry</b> 31:17</p> <p><b>equaled</b> 140:9</p> <p><b>especially</b> 72:10 106:8,9 152:13</p> <p><b>ESPINOSA</b> 3:13</p> <p><b>essential</b> 131:21</p> <p><b>essentially</b> 74:23</p> <p><b>established</b> 62:6 67:7</p> <p><b>ESTELA</b> 3:13</p> <p><b>estimate</b> 90:7</p> <p><b>estimates</b> 60:20 154:7</p> <p><b>ESTRADA</b> 3:13</p> <p><b>et</b> 134:6</p> <p><b>ethnicities</b> 119:17</p> <p><b>EULALIO</b> 3:12</p> <p><b>EVELYN</b> 1:7</p> <p><b>event</b> 29:6</p> <p><b>events</b> 44:12 46:18 51:20 135:9 151:20</p> <p><b>everybody</b> 10:3</p> <p><b>everyone</b> 107:4 108:12,24 109:5 110:25 118:23</p> <p><b>everything</b> 10:25 17:12</p> <p><b>evidence</b> 99:10,11</p>	<p>100:18 101:6,10,22 116:3</p> <p><b>exact</b> 32:6 135:2,3 148:13 150:7</p> <p><b>exactly</b> 15:24 40:7 67:16 68:14 69:21 83:23 107:3</p> <p><b>Examination</b> 7:6,7 9:3 156:13</p> <p><b>example</b> 29:11 76:16 81:23 105:18</p> <p><b>examples</b> 26:23 82:11 132:4</p> <p><b>Excel</b> 30:17 31:8</p> <p><b>except</b> 160:2</p> <p><b>exception</b> 76:24</p> <p><b>execute</b> 17:13</p> <p><b>executed</b> 137:6 139:25 140:5 160:12</p> <p><b>executive</b> 14:4 18:2,3,5</p> <p><b>exercise</b> 92:20</p> <p><b>Exhibit</b> 8:1,2,5,7,9,11,15,17 ,19,21,23 21:20,22 25:14,16 30:13,15 56:2,4 61:1,3 80:23,25 116:6,8 119:10,12 122:7,9 135:23,25 157:9</p> <p><b>exhibits</b> 57:14</p> <p><b>exist</b> 55:9</p> <p><b>existence</b> 24:23 25:3</p> <p><b>existing</b> 44:15 127:2,14 129:10,19 144:6,16 145:8 146:6,17,18,24 147:3,8 149:9</p> <p><b>expenses</b> 138:22 139:14</p> <p><b>experience</b> 42:9</p>	<p><b>Expiration</b> 161:19</p> <p><b>EXPIRES</b> 160:18</p> <p><b>explain</b> 29:2</p> <p><b>explaining</b> 81:23 82:6</p> <p><b>expressed</b> 114:17,21,24,25 160:12</p> <p><b>extent</b> 27:7,25 41:1,16 43:8,22 48:2 63:8,13 73:7 101:9 102:3 104:2 110:9 119:19 137:20 138:4 146:7 147:1</p> <p><b>extra</b> 132:19,22</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p><b>fact</b> 70:6 75:16 97:16,20 105:4 108:25</p> <p><b>facts</b> 116:3 161:3</p> <p><b>fall</b> 152:8,19,25</p> <p><b>falls</b> 128:16</p> <p><b>false</b> 113:15</p> <p><b>falsely</b> 113:16</p> <p><b>Familia</b> 39:24 59:23</p> <p><b>familiar</b> 119:19 135:8</p> <p><b>familiarity</b> 116:21 125:6</p> <p><b>Fax</b> 5:6,11,18,24</p> <p><b>February</b> 8:18,20,22 115:21 116:13 120:6 122:16</p> <p><b>Federal</b> 4:14 98:11</p> <p><b>feel</b> 35:2 81:7</p> <p><b>feeling</b> 11:23</p> <p><b>field</b> 74:3 86:25</p> <p><b>figures</b> 137:2 138:20</p> <p><b>filed</b> 23:2 61:12 65:5,21 86:1,9 87:12,24 88:16 89:2</p>
--	--	---

<p>99:7</p> <p><b>finances</b> 18:13</p> <p><b>financial</b> 39:3 126:24 130:5,11,12,14 133:2,6 134:13 139:1 140:8 141:24 147:20 148:3,6,10</p> <p><b>fine</b> 14:22 85:17,19 103:23</p> <p><b>finish</b> 10:22 11:4</p> <p><b>finished</b> 109:22</p> <p><b>Firm</b> 161:20</p> <p><b>first</b> 8:3 9:2 10:15 13:15 17:3 55:22 81:17 117:5 119:22,23 150:6,22 161:5</p> <p><b>firsthand</b> 35:9</p> <p><b>five</b> 49:22 92:6</p> <p><b>fliers</b> 39:9</p> <p><b>Floor</b> 5:10</p> <p><b>FLOYD</b> 1:4</p> <p><b>focus</b> 129:17 154:1,2,4</p> <p><b>focused</b> 48:14 137:22</p> <p><b>folks</b> 124:18</p> <p><b>forced</b> 133:23</p> <p><b>forces</b> 126:23</p> <p><b>Ford</b> 27:5</p> <p><b>foregoing</b> 160:1,11 161:4,7</p> <p><b>foremost</b> 10:15</p> <p><b>forgot</b> 60:15</p> <p><b>form</b> 31:19 44:20 47:10 71:10,15,25 73:17 76:23 86:4,13,19 87:16,22 88:21 89:8,16 90:2,10,16,23 91:2 93:1 102:21 133:8,19</p>	<p>134:19</p> <p><b>formal</b> 73:23</p> <p><b>formed</b> 24:25 25:1,8</p> <p><b>forms</b> 72:14,16 74:7,18 75:24 76:8,14 77:2 80:15 87:3 91:6 92:18,25 96:19 97:17 102:17 105:1 106:7 114:7 127:3,21 132:12,18,21 133:4,10,17,18,25 134:3,7,8,9,15 149:20</p> <p><b>forth</b> 161:7</p> <p><b>forum</b> 60:6</p> <p><b>forums</b> 44:11 46:18 51:19 60:7 135:9</p> <p><b>forward</b> 98:13</p> <p><b>Foundation</b> 27:5,6</p> <p><b>foundations</b> 26:13,15,19</p> <p><b>founding</b> 27:11</p> <p><b>frame</b> 93:18</p> <p><b>fraud</b> 108:3,17,21 109:3,10,18 110:3,11,21 111:2,11,14,17 112:2 114:7,8,9,12 154:3,4,9</p> <p><b>fraudulent</b> 111:14</p> <p><b>free</b> 74:13,14</p> <p><b>Freedom</b> 40:1</p> <p><b>frequently</b> 135:14</p> <p><b>front</b> 38:1 47:16 70:19 109:12,14 126:14,17</p> <p><b>FT</b> 161:1</p> <p><b>fulfill</b> 75:17 148:15,24 149:2</p> <p><b>fulfilling</b> 126:25</p>	<p>143:23 147:7</p> <p><b>full</b> 9:8 95:6 161:7</p> <p><b>full-time</b> 15:12</p> <p><b>fully</b> 93:16</p> <p><b>function</b> 127:18,24</p> <p><b>Fund</b> 2:3 5:3 8:4,6,8,13 9:18,24 61:11 81:13 82:5</p> <p><b>funding</b> 26:12,15,24 27:8,13,16 137:21</p> <p><b>fundraising</b> 27:24,25</p> <p><b>funds</b> 28:7 72:8 141:13,16,20,21 142:1,2</p> <p><b>Fund's</b> 145:16</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p><b>GANDY</b> 1:8</p> <p><b>GARCIA</b> 3:13</p> <p><b>gas</b> 39:13 148:2</p> <p><b>geared</b> 131:13</p> <p><b>general</b> 5:22 12:13 24:22 37:14,17 44:24 51:23,24</p> <p><b>generally</b> 24:25 35:21 42:6 45:10,22 74:6,13</p> <p><b>General's</b> 9:6</p> <p><b>Georgia</b> 49:1</p> <p><b>gets</b> 149:13</p> <p><b>getting</b> 71:19 74:23 80:18,20 111:9 132:16 142:11 147:13 149:14,19,23 153:10</p> <p><b>given</b> 43:19 120:7 150:22 155:22 160:13 161:12</p> <p><b>goals</b> 15:20</p> <p><b>GORDON</b> 1:7</p> <p><b>Gotcha</b> 100:8</p>
---	---	---

<p><b>gotten</b> 70:11</p> <p><b>government-issue</b> 118:13</p> <p><b>government-issued</b> 115:25 116:17 118:3,15,16 119:6 120:13 121:2,8 122:1,21 123:1</p> <p><b>GOVERNOR</b> 1:12</p> <p><b>grad</b> 42:17</p> <p><b>graduate</b> 13:7,10,13</p> <p><b>graph</b> 116:14 117:20,24 118:18 119:2,3,15 120:10,22 121:11,18,23 122:3,4,17 125:12</p> <p><b>graphical</b> 116:11 117:16 118:7 119:13 122:13</p> <p><b>graphs</b> 125:14</p> <p><b>great</b> 54:19</p> <p><b>greatly</b> 76:15</p> <p><b>Green</b> 4:3,6 7:5 9:1,5,10,11 10:4,11 11:23 12:12 13:4,15 18:17 19:7 20:7 21:21 22:4 23:10 24:2,8 25:15 30:14 31:5 35:13 36:8 46:6 49:14 50:3 56:3,10 57:18 61:2,3,8 69:10 73:8 80:24,25 85:24 86:8 87:11 92:10 95:9 97:3 99:23 103:18,24 108:17 109:7 110:18 111:2,13,19,21,24 112:4,10,21,25 113:4,10,14,20 114:1,6,16 115:10,19 116:7,10,20 119:11,12,19 120:6 122:8,9,17 123:5,10 124:4,24 129:25 132:7 134:21</p>	<p>135:24,25 136:12 145:14 153:18 154:11,17 155:6,18 156:15 158:6 159:2 160:1,5,9 161:4</p> <p><b>G-R-E-E-N</b> 9:11</p> <p><b>grid</b> 31:9</p> <p><b>ground</b> 10:14 34:25 35:8 139:23</p> <p><b>group</b> 60:23 75:3,6 77:15 105:8,14</p> <p><b>groups</b> 75:14</p> <p><b>guess</b> 19:24 40:14 49:6 53:10 105:1 126:3 131:9 132:4 142:10 148:1 151:21 152:1</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p><b>HAMILTON</b> 1:4</p> <p><b>hand</b> 149:19 160:13 161:12</p> <p><b>handed</b> 68:22 116:11</p> <p><b>handgun</b> 72:23 78:6,7 134:5</p> <p><b>handing</b> 21:21 25:15 30:14 56:3 61:2 80:24 116:7 119:11 122:8 135:24</p> <p><b>happen</b> 123:20 136:18 137:11 140:20,23 148:9</p> <p><b>happy</b> 88:11 111:12</p> <p><b>hard</b> 108:23 148:16</p> <p><b>harder</b> 97:17 107:23</p> <p><b>hardship</b> 81:23</p> <p><b>harm</b> 96:3,5 105:7,10,11</p> <p><b>harmed</b> 69:5 70:4</p> <p><b>haven't</b> 51:3 133:13 151:4 154:25</p> <p><b>having</b> 9:2 74:23</p>	<p>110:2,20 123:5 131:2</p> <p><b>Haygood</b> 5:9 9:23 10:9</p> <p><b>head</b> 10:19 93:5 142:5 150:14</p> <p><b>heading</b> 22:17 138:17</p> <p><b>headquarters</b> 57:24 60:16</p> <p><b>hear</b> 11:7 130:24</p> <p><b>held</b> 15:8 59:8,10 60:2,12 125:18,25</p> <p><b>helped</b> 150:5,18,21</p> <p><b>helpful</b> 111:7,10 123:25</p> <p><b>helping</b> 127:2</p> <p><b>helps</b> 100:6 101:12</p> <p><b>hereby</b> 160:1 161:3</p> <p><b>here's</b> 21:24</p> <p><b>hereto</b> 4:16 161:4</p> <p><b>HERMAN</b> 1:7</p> <p><b>HERNANDEZ</b> 3:14</p> <p><b>he's</b> 18:22 32:17 55:8 88:4 125:4</p> <p><b>HIDALGO</b> 2:9</p> <p><b>higher</b> 150:8</p> <p><b>hinder</b> 143:18,21</p> <p><b>hinders</b> 147:15</p> <p><b>Hispanic</b> 2:8 106:10</p> <p><b>Hispanics</b> 72:6 74:5 75:13,21</p> <p><b>history</b> 136:14</p> <p><b>hope</b> 54:19 124:22</p> <p><b>horribly</b> 82:25</p> <p><b>host</b> 44:12 46:18 49:5</p> <p><b>hosting</b> 134:23</p> <p><b>hour</b> 19:19</p> <p><b>hours</b> 135:12</p> <p><b>House</b> 3:3 42:21</p>
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<p><b>Houston</b> 4:13 12:15,16,21 15:14 59:12,24 60:17</p> <p><b>Hubert</b> 42:24 43:1,2,3</p> <p><b>Huh</b> 91:20,23 102:23</p> <p><b>huh-uh</b> 64:15 77:19 93:5</p> <p><b>hundreds</b> 82:12</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p><b>I'd</b> 11:3 18:21 23:1,6 55:8 97:3 99:22 110:9 112:7 157:8</p> <p><b>ID</b> 8:10 44:3,6,13,20 45:2,11,14,23 46:8,11,14,19,23 47:10,14,21 48:7,11,17 49:17 50:6,9 54:24,25 55:1,14,22 56:21,22,23 57:4 58:22 59:4 60:5 68:6 71:10,15 72:1,14,15,17,21 73:17 74:7,18,20 75:24 76:8,14,21,24,25 77:2 78:2,3,14,16 80:15 81:24 82:8,15 86:4,13,20 87:3,16,23 88:22 89:8,16 90:2,10,16,23 91:2,6 92:25 96:19 97:17 102:17 105:1,19 106:7 114:18 115:2,12,25 116:18 118:3,13,15 119:7 120:13 121:2,8,13,22 122:1,21 123:1 126:9 127:3,21 132:13,18,21 133:5 134:3,6,25 149:20 153:6</p> <p><b>idea</b> 69:11 106:14</p> <p><b>identification</b></p>	<p>8:17,19,21 70:25 72:24 77:16</p> <p><b>identified</b> 87:2</p> <p><b>identify</b> 52:14 77:1,3,8 79:5 82:23 83:7,10,15 85:24 86:10,17,21 87:4,8,13,18,20 88:19 89:5,9,10,13,24 90:8,14,21,25 96:2,6,13,16</p> <p><b>identifying</b> 89:20</p> <p><b>identity</b> 23:7 160:10</p> <p><b>IDs</b> 72:12 92:18 102:17 105:20,22,25 106:2 118:15,16 133:25 147:22</p> <p><b>I'll</b> 10:21,23 11:8,14 14:19,20 20:7 28:14 33:2 35:13 36:1,8 61:25 68:24 69:14 70:1,14 73:6 99:18 101:8 102:2 104:8 109:9 110:6 115:9 116:19,21 117:15 123:9,18,24 124:11 125:3,5 152:16</p> <p><b>illegal</b> 108:18 109:4 110:4,5,22 111:3,22 112:2,10,14,18,21,25 113:4,10,14,20 114:2</p> <p><b>illness</b> 11:25</p> <p><b>I'm</b> 9:5,6 10:1,13 11:10 13:24 14:25 19:6 20:13 21:21 23:5 25:15 30:14 42:25 45:5 47:1 48:5,14 53:13 56:3,6 61:2 62:16 65:17 66:19,20 69:1 70:8 76:3 80:24 81:21 85:21,22 88:11 92:4 94:23 98:17 99:6,9,10,15 100:11,17,23 101:16</p>	<p>102:24 103:18 109:8,18 110:23 111:12 112:4 113:8 116:7 117:19 118:21 119:11,22 120:3,20 122:8 126:21 130:24 133:16,18 134:18 135:24 139:18,23 155:12,23 156:9</p> <p><b>imagine</b> 126:12</p> <p><b>Imani</b> 2:4 5:3 8:13 61:11,17 62:2,14,19,21,24,25 70:21 77:5,9,17</p> <p><b>immediately</b> 82:3</p> <p><b>impact</b> 96:7 105:14 128:13 129:2,21 141:3</p> <p><b>impacted</b> 34:25 65:4,19 66:17,25 68:6 96:9 105:25 106:3 115:15</p> <p><b>impacts</b> 35:10 54:1 144:11 149:11</p> <p><b>impeded</b> 70:21</p> <p><b>implement</b> 16:4</p> <p><b>implementation</b> 94:9 140:5</p> <p><b>implemented</b> 93:16,18,21,23,24 94:6,8,18 98:13</p> <p><b>important</b> 51:21</p> <p><b>impose</b> 81:24</p> <p><b>impossible</b> 92:11,13,22 93:1</p> <p><b>improperly</b> 103:4,7</p> <p><b>inability</b> 86:3,12,19 87:15,22 88:21 89:7,15 90:1</p> <p><b>inaccurate</b> 118:18</p> <p><b>INC</b> 3:16</p> <p><b>include</b> 39:23 52:4</p>
---	---	--

<p>141:13 146:5</p> <p><b>included</b> 52:22 68:17 102:16</p> <p><b>includes</b> 111:16</p> <p><b>inclusive</b> 104:24</p> <p><b>incorporated</b> 141:5</p> <p><b>incorporating</b> 131:8,14 149:15</p> <p><b>increase</b> 129:15</p> <p><b>increasing</b> 26:21</p> <p><b>independent</b> 53:15,20 58:4,8</p> <p><b>independents</b> 122:25</p> <p><b>INDEX</b> 7:1 8:1</p> <p><b>indicated</b> 118:10 119:5 120:25 121:6 161:5</p> <p><b>indicates</b> 119:3 137:11</p> <p><b>indicating</b> 95:22 130:22 150:21 157:10</p> <p><b>individual</b> 26:13 27:9</p> <p><b>individually</b> 62:1 64:6</p> <p><b>individuals</b> 61:22 62:8 63:25 64:1 68:18 69:3</p> <p><b>influence</b> 111:15</p> <p><b>inform</b> 134:23</p> <p><b>information</b> 12:13 34:19 35:24 40:14 52:15 77:25 91:18 94:15 95:4,10,18,21 118:17 119:2 121:17 150:13,17,20,23 151:3</p> <p><b>initiated</b> 25:2</p> <p><b>initiative</b> 112:16 113:1</p> <p><b>in-person</b> 132:23</p>	<p><b>instance</b> 4:7 74:15 90:8,14,21,25 92:21</p> <p><b>instances</b> 74:21 92:24</p> <p><b>instead</b> 127:2</p> <p><b>Institute</b> 27:6</p> <p><b>institutions</b> 118:14,15</p> <p><b>instructs</b> 11:15</p> <p><b>instrument</b> 160:11</p> <p><b>Integrity</b> 161:19</p> <p><b>intended</b> 105:7,13</p> <p><b>intent</b> 104:1,3,16 125:2,17,25</p> <p><b>Intention</b> 8:3</p> <p><b>intentionally</b> 113:15</p> <p><b>interact</b> 16:12 18:14 49:3</p> <p><b>interacted</b> 69:23</p> <p><b>interested</b> 161:11</p> <p><b>interests</b> 32:14 33:17,24 34:12 157:16</p> <p><b>interim</b> 43:15</p> <p><b>intern</b> 43:13</p> <p><b>international</b> 25:6</p> <p><b>internship</b> 43:7</p> <p><b>interrogatories</b> 161:5</p> <p><b>interrupt</b> 57:6</p> <p><b>interrupted</b> 103:19</p> <p><b>interruption</b> 28:13</p> <p><b>intervene</b> 33:11</p> <p><b>intervened</b> 61:17 62:7</p> <p><b>intervening</b> 35:22 62:11</p> <p><b>Intervention</b> 8:12 61:9</p> <p><b>introduced</b> 9:15</p> <p><b>introducing</b> 119:22</p>	<p><b>introductions</b> 9:14</p> <p><b>involved</b> 17:14 18:7 25:4 51:6 62:19,25 63:3,11 64:1,8,13</p> <p><b>involvement</b> 61:23 62:1,2,4,5</p> <p><b>iPads</b> 73:25</p> <p><b>isn't</b> 62:18 74:13 152:2</p> <p><b>issue</b> 38:6 40:11 41:9 145:22</p> <p><b>issues</b> 34:23 40:15 128:13 129:2</p> <p><b>issuing</b> 54:7</p> <p><b>items</b> 148:8</p> <p><b>it's</b> 10:8 11:1 13:24 14:23 23:23 28:10,12 31:18 32:22 38:21 42:6 45:17,25 51:21 53:3,5,8 56:21 57:7 58:2,8 68:19 72:4 74:3,12 75:11,12 79:22 80:18 81:5 86:5 92:25 94:17 97:15 98:7 100:13 102:11 103:7 106:12 115:6 122:4 124:24 125:15,22 127:7 128:2,7 132:19 135:12,13 139:4 141:19,20 143:6,14 144:9,10 145:13 147:16 150:8,23,24,25 153:4,14</p> <p><b>I've</b> 63:16 68:22 73:24 75:10,12 92:6 120:7 122:4 152:11,14 153:15 154:20</p> <hr/> <p style="text-align: center;">J</p> <hr/> <p><b>JANE</b> 1:3</p> <p><b>January</b> 93:13</p>
--	--	--



<b>job</b> 13:15 14:3,8 67:18 <b>JOHN</b> 1:6,13 2:12 3:6,19 5:20 <b>join</b> 33:3 35:11 36:25 37:3,10 64:17 66:7 68:12 <b>joined</b> 14:10 32:23 33:4 42:18 44:5 <b>joining</b> 32:15 33:17,25 36:18,22 64:24 65:11 66:1,18 67:23 <b>joint</b> 28:10,11,12 <b>jointly</b> 81:12 <b>JR</b> 3:13 5:22 <b>JUDGES</b> 2:8 <b>June</b> 4:4 159:3 161:13 <b>Justice</b> 5:17 10:2 34:8,20 35:5 54:3 81:6 142:13 <hr/> <div style="text-align: center;">K</div> <hr/> <b>KEN</b> 1:7 <b>key</b> 33:5 38:4 81:9 105:21 128:18 135:15 139:21 141:3,5 145:21,22 149:5,6 <b>kin</b> 161:11 <b>kinds</b> 28:2 38:25 39:2 47:13 50:21 51:6 54:14 130:19 <b>knew</b> 105:2 <b>knowingly</b> 111:20,22 112:11,22 114:2,4 <b>knowledge</b> 48:16 58:11,12 60:2 63:2,8,13 115:1 122:9 138:5 154:11,16 <b>known</b> 73:1 85:25 89:14,25 160:9	<b>KOBY</b> 1:6 <b>Korgaonkar</b> 5:9 9:17,18 10:8 13:1 18:20 19:4 20:7 21:25 23:1,5,19,23 26:17 27:1,18 28:8 29:20 30:25 31:4 32:16,25 33:12,19 34:1,14 35:13,18 36:1,4 37:4 45:16,25 46:3,24 49:8,13,21,23 53:17 55:8 57:5,10,15 58:5 62:3 63:5 64:3,19 65:12 69:7,14,19 73:6 79:18 83:8 84:12,18,24 85:19 86:5 87:6 91:19,21,24 92:1,3,5,8 93:8 94:11,24 95:2,6 96:4 97:8 99:3 100:3,6 101:8,14 102:2,22 103:5 104:2,9 105:9 108:4 109:9 110:6 111:4,7,24 114:14 115:5 116:2,19 117:8 118:19 119:18,25 123:9,18,24 124:8 125:3,9 128:7 129:24 133:8 134:18 137:7 138:7 139:16 142:18 143:25 144:20,24 145:3,11 146:19,21 153:17,22 154:23 156:5,9,14 157:19,22,25 158:8 <b>Korgaonkar</b> ..... <b>156</b> 7:7 <hr/> <div style="text-align: center;">L</div> <hr/> <b>LA</b> 3:15 <b>lack</b> 75:23 77:21 78:2,6,7 147:21 151:5 <b>lacks</b> 76:2,7 132:12 133:4,24 134:15	<b>Lane</b> 161:20 <b>language</b> 60:23 75:3,5 <b>LARA</b> 3:14,15 <b>large</b> 76:22 77:14 <b>last</b> 9:11 17:1 18:19 19:1,14,15 43:1 63:20 95:24 122:5 153:5 <b>later</b> 33:9 103:21 <b>LATIN</b> 1:8 <b>Latino</b> 121:5,25 <b>Latinos</b> 121:12,21 <b>launch</b> 136:22 137:16 139:11 <b>launching</b> 143:11 <b>law</b> 34:3,25 35:1,9 44:9,16 48:3 54:1,4,12,21 57:4 58:22 60:11 65:4,20 66:17,25 68:6 70:25 74:1,7 81:8,24 82:8,15 98:13,15 105:23 127:17 129:4,6,11,13 132:6 134:25 135:8 137:23 140:2 143:12 147:2,3,15 149:11 152:4 <b>lawmakers</b> 123:7,16,22 124:5,13 <b>laws</b> 46:14 51:23,24 69:5 70:4 110:24 114:18 126:6 128:5,13 143:3,4,20,24 144:6,16 145:8 146:6,17,18,24 147:8 <b>lawsuit</b> 9:7 32:15,23 33:3,4,11,18,25 34:5,9,13,22,23 35:12,23 36:18,21,22,25 37:3,10 61:17 62:8 64:18,25
---	--	--

65:5,7,11,21 66:1,7,18 67:1,24 68:12 77:6 157:17 <b>lawyer</b> 73:8 <b>LDF</b> 8:15 10:8,9 <b>Lead</b> 1:5 <b>leaders</b> 44:10 <b>leadership</b> 37:20 38:7 127:10 131:12 <b>League</b> 1:8 2:3 5:2 8:4,6,8,12 9:19,21,25 14:10,13,17,21,25 15:1,4,6,18 17:9,15 18:2,4,8,23 22:22 23:11 24:5,10,22 25:3,8 26:1,6,16,25 27:12 28:5,16,17 29:3,15,18,23 30:5,7 31:25 32:1,8,10,14,23 33:3,10,23 34:11,12,16 35:2,12,22 36:16,20,25 37:10,13,17 38:8,11 39:14 40:21 41:1,13,17 42:1,18 43:17,20 44:25 45:13,21 46:7,13,18,22 47:6,13,20 48:16,23 49:3,15 50:5,8,10,12,17,21 51:14 53:22 54:7 55:5,9,13,20,23 56:17 59:14,24 60:19 61:10,16,23 62:2,7,15,20,23 63:1,4,11 64:1,8,13,16,22 65:9,24,25 66:16 67:14,18 68:4 71:4,8,12,13,23 73:14 74:8 75:1,22 76:6 77:21 78:1,5,10,13,17,20,2	4 79:6 80:17 81:11,13 82:4,23 83:6,15 85:10,25 86:9,11 87:12,14,17 88:16 89:2,13,14,25 90:9,11,15 92:11,16 94:7,14,22 95:3,9,21 96:2,7,10,13 97:4,11,21 98:2,25 99:8,19 101:21,24 102:7 103:3,9,14,24 104:15 105:6,12,24 106:14,19,25 107:8,10,15,25 108:3,8 114:8,13,17,23 115:2,11 123:11 124:1,9,12,19 125:5,7,15,22 126:8,23 127:22,24 128:3,6,14,22 130:20 131:1 132:12 133:3,22 134:14 136:9 137:16,25 141:8 143:13,23 144:6 145:16 146:1,16,24 147:5,7,19 148:14,18,20,21,23 150:2,5,16,20 152:7,18,25 153:19,21 154:6,12 155:9,13 156:17,25 157:16 <b>League's</b> 33:15 34:21 44:2 48:6 52:9 99:21 144:7,17 145:9 146:25 152:9,12 154:14 157:3 <b>least</b> 124:24 125:23 <b>leave</b> 107:21 141:6 <b>Leaving</b> 107:24 <b>led</b> 35:22 <b>legal</b> 9:18,24 32:17 33:1,13,20 34:15 41:15 73:7 81:13 97:9 101:9,10 102:3	103:6 104:4 161:19 <b>legislation</b> 41:18 42:2 43:17,21 44:3 45:2,11,14,23 46:23 47:14 48:7,11,18 49:17 50:6,9 55:1,14 123:23 124:7,15 <b>legislations</b> 46:8 47:21 <b>legislative</b> 3:2 82:20 98:4 99:1,4,15,16 155:10,14 <b>legislator</b> 103:25 104:6,7,16 <b>legislators</b> 98:12 125:18 126:1 <b>legislature</b> 41:20 42:10,13 43:13,19 97:22 98:3,18,23,25 99:12,19,21 100:19 101:22,25 102:7,15 103:3,10,15 105:7,13 110:24 123:6,12 155:9,13 <b>LENARD</b> 3:12 <b>less</b> 94:7 <b>let's</b> 80:6 93:17 148:3 <b>Lets</b> 64:21 <b>Let's</b> 70:16 94:4 134:10,12 <b>letter</b> 54:2,7 81:5,10 <b>level</b> 48:22 <b>licence</b> 134:5 <b>license</b> 72:20,23 76:21 77:22,24 78:6,7 134:5 <b>light</b> 95:8 <b>likely</b> 76:23 82:13 <b>limited</b> 104:25 105:1 126:24 130:4,12 141:19,20
---	--	---

<b>limits</b> 97:16 <b>line</b> 27:19 44:19 47:10 49:9 57:6 <b>lines</b> 31:9 82:6 <b>LIONEL</b> 3:13 <b>list</b> 8:8 23:13 24:18 29:16 30:6,9 31:11,12,14,16 32:3 53:3 72:19 96:17 157:9,14 <b>listed</b> 37:22 68:18 138:6 <b>listen</b> 41:9 123:8,16,22 124:5,13,17,20 <b>lists</b> 24:6 136:21 <b>literally</b> 147:14 <b>litigation</b> 25:19 30:10 56:12 58:23,25 69:9,13,20 70:3 81:2 93:15,17 104:3 136:2 <b>little</b> 14:24 33:9 37:12 45:18 50:4,19 <b>live</b> 42:1 <b>local</b> 71:21 <b>location</b> 52:13,14 <b>locations</b> 44:17 47:7 <b>logo</b> 136:8,9 <b>long</b> 14:5,23 15:8 16:2 19:18 20:1,3,5 24:22 43:6 136:14 <b>longer</b> 63:6 69:9,12,22 <b>LONGORIA</b> 2:9 <b>lot</b> 54:16 71:18 126:4 129:3 151:16,21 152:12 <b>lower</b> 150:11 <b>LULAC</b> 1:9 <b>Lunch</b> 96:24	<b>LYDIA</b> 3:14 <b>LYV</b> 31:1 <hr/> M <hr/> <b>M.B.A</b> 13:14,19,20,21 14:4 <b>machine</b> 4:12 <b>Mack</b> 16:24,25 17:2 <b>M-A-C-K</b> 17:2 <b>main</b> 29:25 128:25 129:17 <b>Maine</b> 49:2 <b>maintain</b> 29:15 150:16,20 <b>maintained</b> 53:6,9 110:13 <b>major</b> 18:7,9 <b>majority</b> 76:22 121:12,20 147:14 <b>manage</b> 15:21 16:14,15,19 18:1 <b>managed</b> 14:4 <b>managing</b> 16:16 <b>marble-mouthed</b> 14:24 <b>MARC</b> 1:3 <b>MARGARITO</b> 3:14 <b>MARIA</b> 2:9 <b>mark</b> 21:16 57:14 <b>marked</b> 21:20,22 25:14,15 30:13,15 56:2,3 61:1,2 80:23,24 116:6,7 119:10,12 122:7,8 135:23,24 <b>market</b> 139:21 <b>MARTINEZ</b> 3:14,15 <b>Master</b> 13:14 <b>material</b> 71:18 148:5 <b>materials</b> 51:17 58:20	91:14 <b>Matters</b> 22:17 <b>MAXIMINA</b> 3:15 <b>may</b> 4:9 11:2,12,13 18:24 19:1,2 20:9 29:13 35:16 59:24 65:3,19 66:24 67:3 68:10 69:17 80:11 152:16 <b>maybe</b> 45:17 63:22 99:3 109:9 143:17 <b>McCRAW</b> 2:14 3:8,20 5:20 <b>mean</b> 17:18 18:12 21:6 29:21 31:15 37:6 38:14,20 39:2,17,18 41:3 44:22 49:5 53:19,24 54:10,16,25 59:24 62:4,17,24 63:2,8,13 64:10 65:16 66:2,4,12,13 67:3,19,21,25 68:1,7,8,9,14,19 69:21 71:16 72:4,13 73:24 74:12,13,22 75:9,10,11 76:9 77:10,11,13 79:7 80:6 83:9,17,23 84:2 85:1,8,15 86:25 89:11,19 90:3,6,18 91:12,17 92:17,23,24 93:4,9,24 94:17 96:9,16 97:18 98:7,10 102:12,13 103:20 104:11 105:1,2,11,18,19 106:6 107:19 108:12,19,20 110:2,20,23 111:17 112:2 114:11,21 115:13 116:4 118:11,16,21,22,23 121:4,23,24 122:23 123:3 124:16,17,18,22 125:11,12 126:2,4,12 127:7 128:2,9,18,24
--	--	---

<p>129:5,6 130:7,9,16,21 131:4,18 132:3 133:10,16 134:17,20 135:2 138:3,11 139:9,20,21 140:11,23 141:5,19 142:12 143:17 144:8,9 146:7,9 147:1,9,24 148:16 149:4,5,20 150:7,12,13,23,24 151:11,16,25 153:2,8,25 156:24 157:3</p> <p><b>means</b> 10:18 11:19 103:7 130:6 133:15 134:2</p> <p><b>meant</b> 66:14,15 67:7 156:16</p> <p><b>media</b> 38:16</p> <p><b>Medical</b> 12:24</p> <p><b>medications</b> 12:4</p> <p><b>meet</b> 20:17,20 66:10 67:10,12,13</p> <p><b>meeting</b> 8:10 17:10 20:5 36:12,14 56:15 57:19,22 58:14,17,24</p> <p><b>meetings</b> 19:9 76:16,17 132:1</p> <p><b>MELLOR-CRUMLEY</b> 1:6</p> <p><b>member</b> 42:21,23 79:8,11 148:1</p> <p><b>members</b> 23:8 24:6 55:5,20,24 60:22 65:2,18 66:11,13,24 67:4,6,8 94:21 131:19</p> <p><b>membership</b> 23:12,13 24:5 28:16 75:3,5 94:22</p> <p><b>MENDEZ</b> 3:12</p> <p><b>mentioned</b> 21:13 30:5 31:21 32:2,5 36:9</p>	<p>38:6 45:6,8 50:17 55:4 56:24 60:18 66:11 67:3,17 68:11 77:18 115:20 149:23 152:1</p> <p><b>messages</b> 38:16</p> <p><b>messaging</b> 58:20</p> <p><b>met</b> 19:12,13,14,15,21,23 35:25 36:10,16,20 67:14 154:21</p> <p><b>MEXICAN</b> 3:2</p> <p><b>Mi</b> 39:24 59:23</p> <p><b>MICHAEL</b> 1:5</p> <p><b>Michelle</b> 2:5 5:3 8:14 61:12,18 64:11,12,14</p> <p><b>middle</b> 100:12 136:13</p> <p><b>military</b> 72:21 78:14,16</p> <p><b>Miller</b> 5:15 10:1,2 156:12 158:2</p> <p><b>mind</b> 70:9 81:19 109:16 110:14</p> <p><b>minority</b> 60:22,23 75:3,5,14,20 105:8,14,25 106:2</p> <p><b>minute</b> 22:2,8 65:17</p> <p><b>minutes</b> 49:22 85:18</p> <p><b>miscellaneous</b> 141:20,21 142:2</p> <p><b>mischaracterizes</b> 37:5 65:13 87:7 118:20 138:8 139:17 142:19 146:21</p> <p><b>mission</b> 8:6 25:23,25 26:3 37:22 126:25 127:8 128:6,17 131:6 132:5 143:13,23 144:7,8,10,12,17,18 145:9,16 146:1,25 147:7,9 148:15,24 149:3 152:9,13,20,21</p>	<p>153:1,3,8 154:1,5 <b>missions</b> 143:16 151:18</p> <p><b>mobile</b> 71:21</p> <p><b>mobilizing</b> 127:1</p> <p><b>model</b> 38:4 145:20</p> <p><b>modify</b> 155:21</p> <p><b>moment</b> 62:18 109:21 157:20</p> <p><b>Monday</b> 20:17,18 57:23</p> <p><b>monetary</b> 39:3 138:20</p> <p><b>money</b> 74:6 130:6</p> <p><b>monitor</b> 47:7</p> <p><b>monitored</b> 44:17</p> <p><b>monitoring</b> 41:3,4,7</p> <p><b>MONTEZ</b> 1:5</p> <p><b>months</b> 43:9</p> <p><b>move</b> 103:22</p> <p><b>moved</b> 98:13 155:7</p> <p><b>myself</b> 28:11 131:18,24</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p><b>NAACP</b> 3:1 5:10 9:18,24 40:3,12,20 59:23</p> <p><b>Natasha</b> 5:9 9:17 10:8 30:18 68:25</p> <p><b>national</b> 18:11,14 25:10 26:3 27:14,16 37:7</p> <p><b>nearest</b> 52:14</p> <p><b>necessarily</b> 49:5 51:25 156:24</p> <p><b>necessary</b> 17:13 52:5 78:21 149:12,20</p> <p><b>negative</b> 96:14,15 129:21</p> <p><b>negatively</b> 96:7,9</p>
--	--	--

105:13,14		79:9 147:25
<b>neighborhood</b> 12:22	<hr/> O <hr/>	<b>occurred</b> 37:21 85:15
<b>neither</b> 125:6 138:5	<b>oath</b> 11:19 113:17	93:25 138:6,10
<b>Network</b> 40:1 52:23,24	160:10	<b>occurring</b> 57:23 84:4
53:2	<b>object</b> 11:13 55:8	<b>occurs</b> 99:17
<b>NGR</b> 1:4 2:2 3:2,13	73:6 97:8 101:8	<b>October</b> 57:23 58:15
<b>nkorgaonkar@naacpldf.</b>	102:2,21 109:9	59:3
<b>org</b> 5:12	116:19,22 119:18	<b>offenses</b> 111:16
<b>nod</b> 10:19	123:9 125:3	<b>office</b> 9:6 37:7 53:4
<b>Nods</b> 142:5	<b>objected</b> 110:11 145:4	71:22 79:16 112:17
<b>nomination</b> 112:16	153:23	160:13 161:12
<b>nonetheless</b> 111:9	<b>objecting</b> 134:18	<b>official</b> 2:13,15
<b>non-minorities</b> 106:3	<b>objection</b> 13:1 18:20	3:7,8,19,21 15:16
<b>nonprofit</b> 26:9	19:4 26:17 27:1,18	111:23 112:12
<b>nor</b> 161:10,11	28:8 29:20 32:16,25	<b>oh</b> 48:9 49:10 52:7
<b>norm</b> 135:13	33:12,19 34:1,14	56:8 77:25 80:4,6
<b>normal</b> 97:22 98:4	37:4 45:16,25 46:24	93:4 99:24 100:17
99:1,4,20 127:18	53:17 58:5 64:3,19	130:23 133:18
132:4 141:1	65:12 79:18 83:1,8	136:8,15 157:10
155:10,14	84:10,12,18,24 86:5	<b>okay</b> 9:17 10:13
<b>normally</b> 140:24	87:6 96:4 102:10	11:6,10,11,18,23
<b>Notary</b> 160:17 161:3	103:5 104:2 105:9	12:25 13:4,12,22,23
<b>note</b> 10:21 23:1,6	108:4 115:5 116:2	14:21 15:3 17:17
52:8 57:7,15 95:3	117:4 118:19	18:24 19:3,7
110:6,10 153:22	123:19,25 125:6	21:9,15,19 22:16,21
<b>noted</b> 94:14 160:2	128:7 133:8,19 137:7	23:18,22
<b>nothing</b> 158:4	138:7 139:16 142:18	24:8,14,17,21
<b>notice</b> 8:3 21:1,6,7	143:25 145:12 146:19	25:10,13 26:6 29:15
22:7,9 23:3 27:20	154:23	30:5,12,21 31:4 32:5
28:9 53:18 58:6	<b>objections</b> 23:2,6	34:11 37:12 38:10
95:11 109:11,14,19	94:14 95:3 110:13	45:5 46:2,6
110:8 153:24	<b>objective</b> 34:22	47:6,12,22 48:4
<b>Notwithstanding</b>	<b>obscuring</b> 136:5	49:14 50:14,16 53:21
125:14	<b>obtain</b> 44:22,23 78:25	55:11 56:1,8 57:9,17
<b>November</b> 61:13 87:13	79:6,14 86:3,13,19	59:6 61:16 62:14
88:17,24 89:3,6	87:15,22 88:21	63:8,24 65:23 66:20
<b>NW</b> 5:5	89:7,16 90:2,9,16,22	67:10 69:10,18
<b>Nyree</b> 16:25 17:4	91:1,4,5 127:21	70:1,18 71:4
<b>N-Y-R-E-E</b> 17:4	<b>obtained</b> 53:4	73:3,19,22
	<b>obtaining</b> 71:10,15	81:14,19,22 82:11,18
	80:3	83:2,6,15 85:20
	<b>Obviously</b> 130:5	88:15 90:13
	<b>occasions</b>	91:19,24,25 92:5,8
	19:13,20,21,23,24	94:2,6 95:5,7,20,24
	44:21 48:1 71:20	96:1,23 97:2,21
		98:19,22 99:7 100:9

<p>101:2,6 103:2,24  106:22 107:24 108:6  109:11,23 110:2  111:12 112:6,9  114:14 116:5,9  117:6,21,24 118:7,17  119:1,11 122:6 123:5  124:3,24 125:19  126:19 132:10 133:15  134:10 136:12,21  138:12,17  140:4,14,21 142:20  144:5 145:25  146:8,23 147:2,5,24  152:7,11,15 153:17  155:2,5,6,19  156:2,12  157:12,22,24 158:4</p> <p><b>ones</b> 106:9 115:15  129:5</p> <p><b>one's</b> 112:15 113:17</p> <p><b>Open</b> 27:5,6</p> <p><b>operate</b> 26:6</p> <p><b>operations</b> 15:21 18:8</p> <p><b>Opinion</b> 5:23</p> <p><b>opportunities</b> 30:2</p> <p><b>opportunity</b> 66:6  68:11 82:14</p> <p><b>opposed</b> 18:23 150:11  151:8</p> <p><b>option</b> 65:4,20 66:25</p> <p><b>Oral</b> 4:2,6 8:3</p> <p><b>order</b> 74:21 106:7</p> <p><b>organization</b> 15:20  16:2 18:11,15 23:12  24:5 25:6,11,24  26:4,9 27:15,17  28:16 29:5,9 30:3  33:8 39:20 41:10  53:9,11,15,16 58:4  65:3,19 66:11,24  68:10 76:17 80:7,13  94:22 115:16 148:17</p> <p><b>organizations</b> 26:24</p>	<p>36:17 39:15,22 58:2  59:19 135:6</p> <p><b>organize</b> 38:13</p> <p><b>organizing</b> 38:3 39:23  58:3,12 59:22 145:19</p> <p><b>Original</b> 86:1,9</p> <p><b>ORTIZ</b> 1:5 3:12</p> <p><b>OSCAR</b> 1:5</p> <p><b>others</b> 60:4</p> <p><b>otherwise</b> 126:25</p> <p><b>ourselves</b> 9:15 142:11</p> <p><b>out-of-state</b> 72:13  74:15 76:12,25 96:18  106:8</p> <p><b>outreach</b> 58:21 67:5</p> <p><b>outside</b> 50:12 97:22  98:3 99:1,20 128:16  152:8,19,25</p> <p><b>overshadow</b> 147:10</p> <p><b>oversight</b> 17:20</p> <p><b>Owens</b> 2:5 5:3 8:13  61:12,18 64:8  69:4,8,11,24</p> <p><b>OZIAS</b> 1:6</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p><b>p.m</b> 4:10 158:9</p> <p><b>P.O</b> 5:23</p> <p><b>page</b> 7:2 8:1  22:12,14,16 59:1,3  70:18,20 81:17,20,22  99:8,9 100:12 109:16  126:19 130:1 132:7</p> <p><b>PAGE/LINE</b> 159:4</p> <p><b>pages</b> 57:7</p> <p><b>paid</b> 15:10</p> <p><b>paper</b> 30:24</p> <p><b>papers</b> 73:25</p> <p><b>paragraph</b> 70:20 82:3  99:9 100:13,14,18</p>	<p>101:4 126:22 130:1  132:7,8 133:22  136:13,19</p> <p><b>paragraphs</b> 22:18,24  24:12</p> <p><b>partial</b> 30:20 157:14</p> <p><b>participate</b> 31:25</p> <p><b>participated</b> 47:23</p> <p><b>participation</b> 26:21</p> <p><b>particular</b> 29:8 30:4  34:17 59:9 61:5  84:23 85:15 92:24  126:2 127:16 133:22  136:16</p> <p><b>particularly</b> 33:6  41:24 51:16 67:20  74:4 75:20 76:12  96:18 129:3 135:16  157:7</p> <p><b>parties</b> 36:21,23  69:9,12 161:11</p> <p><b>party</b> 34:5,9 70:3  77:6 161:9</p> <p><b>pass</b> 148:5 155:20  156:4</p> <p><b>passed</b> 54:12 98:24  99:13 100:20 101:23  102:1,8 103:11,16  104:23</p> <p><b>passing</b> 55:7</p> <p><b>passport</b> 72:23 78:11</p> <p><b>past</b> 19:24</p> <p><b>pay</b> 39:7,8,9,10,11,12  74:17,20</p> <p><b>PEGGY</b> 1:6</p> <p><b>penalty</b> 11:20</p> <p><b>Pennsylvania</b> 5:5</p> <p><b>PENNY</b> 1:5</p> <p><b>people</b> 16:19,23  17:5,25 18:6 28:19  29:25 30:2 31:20,24  32:11,19,22 33:6</p>
---	---	---



<p>34:3,18 35:10 40:10,12 44:19,21 47:9 51:2 54:1 65:3 67:5 72:9 74:2 76:11 77:12 79:17 84:23 85:11 91:13 105:3 106:20 107:1,22 108:23 115:17,18 116:15 118:9 119:4 127:1,20 128:10 129:16,19 131:9 133:1 135:16 144:13 149:6,23 151:1 153:5,9,12 156:17,24 157:7</p> <p><b>people's</b> 39:9 130:16</p> <p><b>percent</b> 115:23 118:11 119:4 121:4,10,24,25 122:23 123:3</p> <p><b>percentage</b> 116:15 118:9 120:10,22 121:5 122:18,24 150:10</p> <p><b>Perfect</b> 92:8</p> <p><b>Perhaps</b> 98:20</p> <p><b>period</b> 43:12 44:18 47:8</p> <p><b>Periodically</b> 20:12,14</p> <p><b>perjury</b> 11:20</p> <p><b>PERRY</b> 1:12 5:20</p> <p><b>person</b> 31:13 70:23 77:1,3 92:17 107:12,13,16,17 108:1,8,9,10,16 113:6,22,24 114:2,4 160:11</p> <p><b>personal</b> 124:8</p> <p><b>personally</b> 67:12,13,25 160:9</p> <p><b>pertain</b> 23:7</p> <p><b>petition</b> 29:13 84:9 112:15 113:1 156:25</p> <p><b>petitions</b> 156:18</p>	<p><b>phase</b> 151:23</p> <p><b>phone</b> 5:15 10:1 44:14 46:22 47:3,4 52:11,16,17,18 132:15 153:4</p> <p><b>photo</b> 70:24 72:22 78:2,3,15 81:24 82:8,14 115:25 116:18 118:3,13 119:7 120:13 121:2,8 122:21 123:1 132:13 133:4,25 134:3,6,15,25 147:22</p> <p><b>placed</b> 32:3</p> <p><b>places</b> 52:6</p> <p><b>PLAINTIFF</b> 5:14</p> <p><b>Plaintiff-Intervenor</b> 63:7</p> <p><b>Plaintiff-Intervenors</b> 2:6,10 5:2 8:12 61:10</p> <p><b>Plaintiffs</b> 1:10 2:2 3:4,17</p> <p><b>plan</b> 136:23 137:5,13 138:1 139:13 140:5 142:8,22</p> <p><b>please</b> 9:8,9 10:18,21 11:8 17:1 22:1,12 68:25 88:11,15 89:17 93:8 100:16 109:16,21 112:8 120:21 126:19 144:25 145:5</p> <p><b>pledge</b> 28:20 29:7 156:18</p> <p><b>point</b> 9:13 11:2,14 49:12 70:7 93:11 96:3 99:23 147:13 149:13 155:18</p> <p><b>pointed</b> 82:25</p> <p><b>points</b> 82:24 83:3</p> <p><b>policy</b> 41:18 49:15</p> <p><b>Politics</b> 8:17,19,21</p>	<p><b>poll</b> 41:3,4,7 52:14 74:9,25 115:20 116:4,12,15 117:17,19 118:9,22 119:4,14,16 120:5,11,25 121:6,13,22 122:15,19 124:25 125:7,14</p> <p><b>polling</b> 44:17 47:7 52:6,13</p> <p><b>polls</b> 40:10,18 41:8 43:23 44:22 54:13 58:22 70:23 115:14,20 144:13 146:15</p> <p><b>POPE</b> 1:5</p> <p><b>popular</b> 115:3</p> <p><b>population</b> 39:25 81:9 97:19 105:21 127:15 141:3 147:16 157:4,5</p> <p><b>populations</b> 33:5,6 35:1 57:4 75:19 97:20</p> <p><b>portion</b> 75:23 76:7 131:1,3,7 145:6</p> <p><b>poses</b> 33:4</p> <p><b>position</b> 15:8,10,12 148:21,23</p> <p><b>possess</b> 111:22 151:3</p> <p><b>possessing</b> 111:20</p> <p><b>possession</b> 154:14</p> <p><b>possibility</b> 36:17,22 64:24 65:11 66:1,18 67:23 68:19</p> <p><b>possible</b> 11:1 124:25 125:15,23 147:23</p> <p><b>possibly</b> 91:15</p> <p><b>practices</b> 49:7 155:14</p> <p><b>Prairie</b> 81:24 82:12 83:13</p> <p><b>precincts</b> 139:22</p>
---	--	---

<p><b>preclearance</b> 81:6,7 93:15</p> <p><b>pre-cleared</b> 142:12,13,16</p> <p><b>prefix</b> 31:1</p> <p><b>preparation</b> 19:22 20:22,24 21:5 22:9</p> <p><b>prepare</b> 19:8 21:12</p> <p><b>prepared</b> 24:3,14,19 81:10,12</p> <p><b>preparing</b> 20:1</p> <p><b>pre-populated</b> 31:18</p> <p><b>present</b> 6:1 36:12,13,14 44:20 47:10 66:6 89:14,25 115:24 116:17 118:2 119:6 120:12 121:1,7 122:1,20 123:1</p> <p><b>presentation</b> 135:10</p> <p><b>presentations</b> 131:24 151:21 152:3</p> <p><b>presented</b> 65:5,20 66:17,25 117:25</p> <p><b>preserved</b> 102:11</p> <p><b>Presidential</b> 93:25</p> <p><b>pretty</b> 27:7 28:10 37:8 39:24 40:6 41:16 43:22 48:2 54:5 58:18 66:8 74:12 75:18 81:8 92:19 108:20 127:13,20 129:14,21 130:9,10 131:4,5,9 137:22 143:7 149:17</p> <p><b>prevent</b> 12:1,8</p> <p><b>prevented</b> 70:22 108:3</p> <p><b>previous</b> 19:21,23 47:2 54:24,25 107:9</p> <p><b>previously</b> 37:23 50:4 73:19 105:19 123:7 129:12 134:25</p> <p><b>primary</b> 19:2 37:16</p>	<p>128:2</p> <p><b>print</b> 39:13 51:9,16 54:18 71:18 148:5</p> <p><b>printed</b> 30:17</p> <p><b>printing</b> 54:18 148:7</p> <p><b>printout</b> 30:20</p> <p><b>prior</b> 46:9,12,14,16,17,21 47:6,12,18 48:2 55:2,7 60:13 65:13 94:9 128:23 129:12 135:18 145:4 150:1,4 151:12</p> <p><b>privileged</b> 35:23</p> <p><b>probably</b> 11:1 14:20 21:23 47:15 80:12 84:5</p> <p><b>problem</b> 40:11 41:8 100:10</p> <p><b>problems</b> 40:17</p> <p><b>Procedure</b> 4:15</p> <p><b>procedures</b> 97:23 98:4 99:1,4,13,15,20 100:20 101:23 102:1,8 103:11,15 155:11,14</p> <p><b>proceed</b> 133:15</p> <p><b>proceeding</b> 99:16</p> <p><b>proceedings</b> 161:7</p> <p><b>process</b> 25:3,4 35:22 51:17 52:2,3 105:3 112:11 126:6 127:9 128:11 129:1 153:9,10</p> <p><b>produce</b> 110:12</p> <p><b>produced</b> 4:7 25:19 30:9 56:11 81:1 136:1</p> <p><b>production</b> 154:13</p> <p><b>profit</b> 26:7,8</p> <p><b>program</b> 14:4 39:12</p>	<p><b>programming</b> 38:3 145:20</p> <p><b>programs</b> 15:22 16:4 67:19 140:17</p> <p><b>prohibited</b> 82:7</p> <p><b>project</b> 8:10 39:23 58:3,12 59:22</p> <p><b>projection</b> 141:10,11</p> <p><b>projections</b> 60:20 154:7</p> <p><b>promise</b> 122:5</p> <p><b>proper</b> 77:15</p> <p><b>proposal</b> 137:20 140:13</p> <p><b>proposed</b> 41:19 44:4 47:21 48:8,18 50:6 55:1 81:23 82:7,14 98:24 102:14 103:12 137:13 139:20 142:9,10,15,22,23</p> <p><b>proposing</b> 112:15 113:1</p> <p><b>proposition</b> 112:22 115:24 116:16 118:10 122:19</p> <p><b>protection</b> 8:23 38:7 40:6,7,9,20,22 41:2,13 136:17,23 137:5,13 138:1,13 139:13 140:5 142:8,22</p> <p><b>prove</b> 74:19</p> <p><b>proved</b> 160:10</p> <p><b>provide</b> 12:5 26:15,24 34:16,22,24 35:3 40:16 42:1 52:15</p> <p><b>provided</b> 42:7 154:12</p> <p><b>provides</b> 42:5</p> <p><b>providing</b> 12:1 147:20</p> <p><b>provisions</b> 4:15</p> <p><b>public</b> 2:16 3:9,22</p>
---	--	--

<p>79:16 134:23 135:9 160:17 161:3</p> <p><b>PUEBLO</b> 3:16</p> <p><b>purpose</b> 8:6 25:23 97:6,12 145:17</p> <p><b>purposes</b> 14:25 111:9 141:14 148:11 160:12</p> <p><b>pursuant</b> 4:14</p> <p><b>pursuit</b> 127:7</p> <p><b>pushing</b> 99:2</p> <p><b>puts</b> 33:7 75:18 81:9 106:12,13</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>qualified</b> 113:2 114:3,5</p> <p><b>question</b> 10:22 11:6,10,13,14 12:2 18:25 19:5 20:8,11 27:21 32:18 33:2,21,22 34:15 35:14,19 39:18 45:5,10 47:15 52:13 69:16 70:9,12 73:9 76:4 82:25 88:3,4,7,10 89:1,17,18 90:13,24 94:16 95:17,24 97:25 99:14,18 100:1,7,24 101:11,19 102:20,25 103:1 104:4,10,11 106:22 107:9 108:5 109:7 110:8,15 111:25 112:5,23 116:20 117:10,25 119:1 121:16 123:13,14 124:22 125:10 126:21 133:11,12,14,19,20 134:7,19 144:3,14,23 145:4,7,13 148:19 152:10 153:24</p> <p><b>questioning</b> 49:9 57:6</p> <p><b>questions</b> 9:4 10:16,17 11:20</p>	<p>12:6,9 24:21,22 36:9 92:7 152:12 153:16 155:25 156:4,10,14 157:23 158:1,2</p> <p><b>quick</b> 49:9 155:3</p> <p><b>quite</b> 75:10</p> <p><b>quote</b> 83:3 118:1 136:14</p> <p><b>quoted</b> 82:24 83:3</p> <p><b>quotes</b> 82:1,4</p> <p><b>quoting</b> 99:10</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>race</b> 75:3,4,5</p> <p><b>races</b> 119:16</p> <p><b>racially</b> 70:24</p> <p><b>raised</b> 153:19</p> <p><b>range</b> 32:12,20</p> <p><b>rather</b> 127:18 131:20 132:15 149:14 151:23</p> <p><b>Raymonda</b> 16:24</p> <p><b>re</b> 131:4,5</p> <p><b>reading</b> 47:1 65:17 71:1 82:9,16 100:21,25 136:19</p> <p><b>ready</b> 156:9</p> <p><b>real</b> 155:3</p> <p><b>really</b> 28:3 48:14 51:16 131:8</p> <p><b>REALTIME</b> 4:2,6</p> <p><b>reason</b> 54:4 159:4</p> <p><b>recall</b> 13:23,24 20:4 21:4,14 36:15 38:20 43:8,11 48:9,14 58:18 59:9,22,25 62:17,18,21,24 64:10,14 67:16 68:14 69:21 71:7,11 79:7,11,12 80:21 83:23 84:4,14 90:18,19 92:21,23</p>	<p>112:16 115:13 140:8</p> <p><b>receive</b> 27:14 40:14 137:21</p> <p><b>received</b> 13:19 27:17 80:11</p> <p><b>receives</b> 27:12 40:13</p> <p><b>recess</b> 96:24</p> <p><b>recites</b> 145:15</p> <p><b>recognize</b> 22:4 25:20 31:5 56:12 61:3</p> <p><b>reconvene</b> 156:6</p> <p><b>record</b> 4:15 9:9 10:18 18:21 23:2,20 24:2 31:1 50:2 57:16 63:6 96:25 110:7 119:21 124:10 152:5 153:23 155:3,4,5 156:10 157:20,21 158:5</p> <p><b>records</b> 57:7</p> <p><b>recruit</b> 29:18,21</p> <p><b>Rector</b> 5:10</p> <p><b>redirect</b> 156:11</p> <p><b>reduced</b> 161:6</p> <p><b>refer</b> 14:20 40:23,24 41:10 109:18 130:6</p> <p><b>reference</b> 126:22 130:4</p> <p><b>referenced</b> 116:12 117:17 137:6 142:8</p> <p><b>references</b> 59:3</p> <p><b>referendum</b> 112:16 113:2</p> <p><b>referred</b> 67:11 74:25</p> <p><b>referring</b> 14:25 23:11 60:8 100:5 109:18 126:3 130:13,20 133:18 143:5,6</p> <p><b>regard</b> 41:2,18,23 43:17 45:1,22,23 47:14,20 48:17 49:16 50:22 51:14 52:9</p>
---	--	---

53:23 54:6 61:21 63:24 71:9 139:25 152:13 155:22 <b>regarding</b> 22:24 24:11 34:22 46:7,23 51:23 52:2 54:22,23 55:6,14,21 113:17 128:4,15,21,22 143:12,22,24 <b>regardless</b> 79:23 <b>regards</b> 40:22 <b>register</b> 51:1 127:8 143:4 144:8 149:23 150:6,21 153:6,7 <b>registered</b> 51:3 53:3 92:17 106:15,16,21 107:2,5,12,17 108:2,9,10,15 115:23 116:16 118:2 119:5 120:12,25 121:7,25 122:19,25 129:20 144:13 149:7 150:2,17 151:1,6 153:5,12 <b>registering</b> 29:7 71:6 127:1 145:10 149:14 150:9 151:24 <b>registration</b> 37:18 38:5 50:18,22 67:20 129:18 131:11 140:25 147:11 151:15 152:6 153:3 161:20 <b>regular</b> 138:15 161:9,10 <b>regularly</b> 49:3 <b>rejected</b> 103:13 <b>relate</b> 110:11 <b>related</b> 41:12 44:3 48:7 50:5 60:8,21 110:10 <b>relates</b> 46:11,20 54:8 126:7 <b>relating</b> 60:10 153:20 154:8	<b>relative</b> 95:10 <b>relevance</b> 13:2 18:21 26:18 27:19 <b>remember</b> 13:17,24 32:6 58:16 60:16 <b>repeat</b> 11:8 28:22 76:3 89:1 90:13,24 125:19 152:16 <b>repeated</b> 11:7 <b>repeating</b> 70:10 107:9 110:14 <b>rephrase</b> 11:8 33:2,21 64:21 68:4 73:9 88:14,15 89:4 94:10,12 97:10,25 101:13,18 108:6 115:9 119:1 137:9 142:20 144:2 <b>report</b> 16:6,10 17:5 <b>reported</b> 4:11 <b>reporter</b> 6:2 10:17,24 21:18 28:13 97:1 117:4,7 145:1 161:3 <b>Reporter's</b> 7:9 <b>reports</b> 60:20 154:7 <b>represent</b> 25:18 30:17,19 32:11,14,19 56:10,14 61:8 68:24 70:1 80:25 86:8 87:11 111:13 116:10 117:15 119:12,15 122:12 135:25 139:1 157:16 <b>representation</b> 34:25 35:3 61:14 70:5 116:11 117:16 118:8 119:13 <b>representative</b> 43:4 122:14 <b>Representatives</b> 3:3 42:22 <b>represented</b> 10:5 34:7,13 35:4 117:9	<b>representing</b> 9:7 33:16,24 34:2 117:19 120:3 <b>represents</b> 32:7,9 83:12 122:13 <b>request</b> 154:13 <b>requested</b> 145:6 158:10 <b>requested.....</b> .....159 7:8 <b>require</b> 139:14 <b>required</b> 54:13 58:22 60:11 74:19 113:17 116:17 118:2 119:6 120:12 121:1,7 122:1,20 123:1 132:12,18,21 133:4,25 134:3,4,15 139:7 140:9 143:7 147:21 <b>requirements</b> 75:17 115:3,12 121:13,22 126:9 127:16,23,25 128:5,16,21,23 129:22 147:6 <b>requiring</b> 72:10 <b>re-rack</b> 70:16 96:12 <b>reserved</b> 141:17 <b>reside</b> 12:21 <b>resolved</b> 23:8 40:15 <b>resource</b> 17:15 40:16 130:16 131:13 148:3 151:13 <b>resources</b> 38:25 39:2,3 51:6 54:14,16,22 55:13,19,23 74:6 75:17 126:24 127:13,19 130:4,5,11,12,14,19, 25 131:1,5,16 132:10 133:2,6 134:8,13 139:2 140:8,19
--	--	--

<p>141:7,24 142:1 147:19 148:6,11</p> <p><b>respective</b> 61:23</p> <p><b>respects</b> 128:10</p> <p><b>responded</b> 116:15 118:9 119:4 120:11,24 121:13,21 122:18</p> <p><b>respondents</b> 121:6</p> <p><b>response</b> 16:22 31:23 42:11 57:2 61:24 62:10 100:22 103:8,17 109:13 126:16 142:9,23 145:5</p> <p><b>responsibilities</b> 15:17 128:19</p> <p><b>responsible</b> 26:20 31:13</p> <p><b>responsive</b> 154:12</p> <p><b>rest</b> 14:19</p> <p><b>restate</b> 33:21 97:25 104:11 106:22 123:14</p> <p><b>result</b> 56:23 82:14</p> <p><b>results</b> 117:19 119:14,15 122:13,14 124:25</p> <p><b>retract</b> 55:21 86:15 108:16</p> <p><b>retreading</b> 139:23</p> <p><b>reveal</b> 20:8 35:15 36:5 69:16</p> <p><b>review</b> 20:24 21:2 109:21,24</p> <p><b>reviewed</b> 21:1,6 22:8 110:2,20</p> <p><b>rhaygood@naacpldf.org</b> 5:12</p> <p><b>RICK</b> 1:12 5:20</p> <p><b>rights</b> 5:17 8:16 41:25 70:21 143:3</p>	<p>146:14</p> <p><b>risk</b> 11:20</p> <p><b>Rock</b> 39:24</p> <p><b>role</b> 17:9</p> <p><b>rolls</b> 129:16</p> <p><b>room</b> 4:13 9:14 19:10 20:21</p> <p><b>rough</b> 79:22</p> <p><b>ROXANNE</b> 3:14</p> <p><b>rules</b> 4:14 10:14</p> <p><b>run</b> 136:22 137:25 138:3 139:13 140:17</p> <p><b>Ryan</b> 5:9 9:23 10:8</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p><b>S.H.A.P.E</b> 59:10</p> <p><b>Safety</b> 2:16 3:10,22 79:16</p> <p><b>sake</b> 31:1</p> <p><b>salaries</b> 39:10,12 51:8</p> <p><b>sample</b> 82:12</p> <p><b>Sanders</b> 16:9 17:23 36:10</p> <p><b>saved</b> 83:1</p> <p><b>saw</b> 63:18</p> <p><b>SB</b> 45:8 46:9,12,14,17,20,21 47:7,12,19 48:3 53:23 54:6,8,15,23 55:2,7,15,21,22 57:2 60:9,13,22 69:6 70:4,22 71:10,15,23 72:1,17 73:15,17 74:8 75:1,24 76:8 77:2 82:20 84:17 85:13 86:4,13,20 87:16,23 88:22 89:8,16 90:2,10,16,23 91:2,6 92:11,22 93:2,12,18 94:6,8,10 96:3,8,15</p>	<p>97:4,5,11,22,23 98:4,23 99:13,21 100:20 101:24 102:1,9 103:4,11,16,25 104:16 105:7,15,23 108:21 114:8,24 115:4,22 125:1,16,23 126:7,23 127:4,11,16 128:16,21,23 129:12 131:2,15,17 132:6,13 133:5,25 134:4,16 135:18 139:25 140:6 141:25 142:9,16,24 143:5,6,7,23 147:3,6 148:15,25 149:3,22 150:1,4,11 151:6,12,15 152:8,13,19,24 155:10,15</p> <p><b>school</b> 13:5,7,10,13,16</p> <p><b>scope</b> 27:20 28:9 58:6 152:9,19,25 154:24</p> <p><b>seal</b> 160:13 161:12</p> <p><b>Secretary</b> 1:13 2:14 3:7,20 53:4,6 85:8</p> <p><b>Section</b> 5:16 8:15 81:7 98:11 100:5</p> <p><b>secure</b> 127:3 149:10</p> <p><b>secured</b> 129:10</p> <p><b>seek</b> 65:24 66:3,9</p> <p><b>seeking</b> 94:16</p> <p><b>seen</b> 61:6 63:15,16,17 81:2 116:23 119:23 122:10 136:2 154:20</p> <p><b>segment</b> 77:14</p> <p><b>send</b> 46:22</p> <p><b>sense</b> 153:14</p> <p><b>sentence</b> 81:25 82:9,16 100:21 101:4 118:5,6 134:1 145:19</p> <p><b>separate</b> 57:14</p>
---	--	--

<b>September</b> 81:16 82:19 <b>SERGIO</b> 1:4 <b>series</b> 22:18 <b>serve</b> 28:17,18 39:25 75:19 76:11 <b>served</b> 30:6 <b>serves</b> 65:10 <b>session</b> 41:19 82:20 <b>seven</b> 80:15 <b>several</b> 19:13,20,24 30:2 31:15 80:7 147:25 <b>shake</b> 10:19 <b>share</b> 49:7 <b>Shelby</b> 98:9,10 <b>she's</b> 23:10 62:22 77:6 <b>shifted</b> 54:17 <b>shifts</b> 141:4 <b>short</b> 123:6 127:12 <b>shorthand</b> 4:12 161:2 <b>showing</b> 117:18 <b>shows</b> 117:20 <b>sign</b> 112:14,22 113:1 <b>signature</b> 7:8 158:10 159:1 160:1 <b>signed</b> 28:20 29:13 156:17,18,25 <b>signer</b> 113:2 <b>significance</b> 101:10 <b>significant</b> 75:23 76:2,7,10 107:22 136:16 149:16,21 <b>significantly</b> 150:8 <b>signing</b> 29:7 <b>similar</b> 41:15 58:12 63:22 <b>simplification</b> 14:24	<b>simultaneously</b> 116:25 <b>sisters</b> 12:25 <b>six</b> 43:8,9 <b>skim</b> 22:2 <b>Slaughter</b> 161:20 <b>slightly</b> 142:19 <b>slow</b> 28:14 87:7 129:24 <b>social</b> 38:16 72:4 <b>socially</b> 26:20 <b>Society</b> 27:5,6 <b>sole</b> 128:18 <b>solely</b> 153:4,11 <b>solicit</b> 114:2,4 <b>Solutions</b> 161:19 <b>someone</b> 41:7 68:10,13 92:22 107:25 <b>sometime</b> 93:18 <b>somewhere</b> 109:12 <b>sorry</b> 20:13 23:19 42:25 45:5 53:13 55:21 56:6 60:15 70:8 76:3 83:19 86:15 96:11 99:6 100:17,23 103:18 111:20 113:8 130:24 133:9,18,21 139:23 146:20 <b>sort</b> 18:1,2 29:6,14 127:9 147:16 151:22 153:14 <b>sought</b> 55:5 64:16,23 65:1 <b>Sounds</b> 49:23 <b>source</b> 27:8 128:25 <b>sources</b> 27:11,13 <b>Southern</b> 1:1 4:12 13:6,11 14:1,9 <b>space</b> 34:17	<b>speak</b> 18:12 151:20 <b>speaker</b> 5:15 <b>speaking</b> 11:4 116:25 <b>specific</b> 29:9,10,11 31:13 45:8 67:15 89:9,10,11 90:8,14,21,25 91:17 92:21 97:18,19 105:8 132:23 134:17,20 139:21 140:22 141:14,15 152:14 <b>specifically</b> 11:15 20:3 49:16 50:20 51:14 52:9 53:22 72:12,13 77:11 84:2 86:24 92:23 114:24 140:12 <b>specified</b> 32:21 <b>speculation</b> 53:18 58:6 84:5,11,13,19,25 115:8 <b>spell</b> 9:8 17:1 <b>spend</b> 20:1 30:24 <b>spending</b> 132:22 135:3 149:21 151:16 <b>spent</b> 54:22,23 55:13,20,23 134:22 139:2 <b>spoken</b> 155:1 <b>spreadsheet</b> 30:17 31:8 <b>staff</b> 17:10 51:8 66:13,14,16,18 79:8,11 131:19 147:25 151:22 <b>stamp</b> 57:11 <b>stands</b> 84:24 <b>start</b> 9:15 70:14 134:10,12 143:10 147:12,13 148:21 150:19
---	--	--



<p><b>started</b> 26:3 133:13</p> <p><b>state</b> 1:13 2:12,14 3:1,7,20 4:11 5:20 9:7,8 15:7,17,19 16:7 17:9,18,19,20,22 18:21 25:5 28:11 32:12 35:25 36:9 37:3,11 38:23,24 39:16 42:6 43:4 47:25 48:8,12,18,22 50:7 51:4 53:7,12,14,25 85:8 93:3 98:12 106:25 107:3,11,15,20,24 118:13,14 131:18,25 134:24 150:3 160:7,18 161:1,3</p> <p><b>stated</b> 4:15 22:8 25:25 57:18 81:25 82:25 99:18 108:5 116:20 123:6 128:16 139:24 144:1 148:24 149:3 152:20 161:3</p> <p><b>state-issued</b> 134:5</p> <p><b>statement</b> 23:11,16 37:22 101:7 151:10</p> <p><b>statements</b> 82:5,24 83:4,7,12,18,21 84:3,16 85:12</p> <p><b>states</b> 34:5,6,7,13 35:4 118:1 123:3 158:3</p> <p><b>State's</b> 53:4</p> <p><b>STATES</b> 1:1 2:1 5:14</p> <p><b>statewide</b> 32:19 38:21</p> <p><b>stating</b> 145:21,25</p> <p><b>statistics</b> 115:14</p> <p><b>status</b> 47:25 72:5 106:11 113:18</p> <p><b>statute</b> 113:17</p> <p><b>STEEN</b> 1:13 2:13 3:6,19 5:20</p>	<p><b>Stephen</b> 5:22 9:5 30:25 49:8 57:5</p> <p><b>stephen.tatum@texasat tornygeneral.gov</b> 5:25</p> <p><b>steps</b> 52:5 80:10 132:23</p> <p><b>STEVE</b> 2:14 3:8,20</p> <p><b>STEVEN</b> 5:20</p> <p><b>stipulation</b> 23:8,21</p> <p><b>stood</b> 44:19 47:9</p> <p><b>stop</b> 95:6</p> <p><b>stopping</b> 49:12 98:8</p> <p><b>strain</b> 129:14</p> <p><b>Street</b> 4:13 5:10</p> <p><b>strict</b> 70:24</p> <p><b>strictly</b> 151:14</p> <p><b>strike</b> 102:16</p> <p><b>struck</b> 98:11</p> <p><b>student</b> 44:9,10 48:2 72:12,15 74:16 76:17,24 102:17 105:19,20,22</p> <p><b>students</b> 46:14 72:13 76:13,19,23 81:25 82:5,12 83:13,16 96:18 105:25 106:8 129:4 135:16</p> <p><b>studies</b> 43:25 60:20</p> <p><b>stuff</b> 54:20 141:1 146:15</p> <p><b>Subject</b> 125:9</p> <p><b>submitted</b> 54:3 81:5,16 82:18</p> <p><b>subscribed</b> 160:11</p> <p><b>successful</b> 80:2,19</p> <p><b>suffered</b> 96:3</p> <p><b>suffering</b> 11:25</p> <p><b>suggestion</b> 111:5</p>	<p><b>Suite</b> 161:20</p> <p><b>summary</b> 65:14</p> <p><b>summer</b> 93:19,20,22 140:3</p> <p><b>support</b> 26:21 106:14 114:17,21,24,25 115:12,16 122:19 126:9,12 161:19</p> <p><b>supported</b> 121:13,22</p> <p><b>sure</b> 9:10 11:9 12:23 17:12 23:5 33:23 37:18 44:5,15,18 45:19 46:4 47:9 49:10,11,21 62:6,16 68:20 72:20 73:10 76:5 80:8 86:7 88:2,6,16,25 89:2 90:14,25 93:10 97:24 98:2 99:5,24 100:2 102:11 104:12,13 106:20,23,24 107:1,12,16 108:15 110:15 111:6 121:15,17 123:15 124:10,11 125:20 129:5,7,11,19 131:9,14 135:15,17,19 141:4 143:15,19 144:11 146:13 149:9,10,12 153:13 156:7</p> <p><b>survey</b> 84:8</p> <p><b>swear</b> 113:16</p> <p><b>swearing</b> 113:15</p> <p><b>sworn</b> 4:8 9:2 161:5</p> <p><b>system</b> 52:20</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p><b>table</b> 50:25</p> <p><b>tabling</b> 50:23,24,25 152:2</p> <p><b>taking</b> 12:4 85:18 135:4 148:21 161:8</p> <p><b>talk</b> 11:2 12:12 33:9</p>
--	---	---

<p>74:1 76:11 97:3 132:1 141:24</p> <p><b>talked</b> 28:15 43:18 45:6,12 74:2</p> <p><b>talking</b> 29:11 37:12 43:16 50:10 98:14,17 99:16 155:7,11</p> <p><b>talks</b> 94:20</p> <p><b>Tamara</b> 4:10 6:2 161:2,18</p> <p><b>target</b> 29:25 31:20 58:21 80:9 139:21 157:3,4,5</p> <p><b>targeting</b> 143:2</p> <p><b>Tatum</b> 5:22 9:4,5,13 10:3,4 13:4 18:24 19:7 20:13 21:16,19,21,23 22:1 23:4,10,22,25 24:1 26:23 27:4,23 28:12,14 29:23 31:3,5 32:22 33:2,15,23 34:4,21 35:21 36:8 37:9 45:19,20 46:2,5,6 47:1 49:10,14,19,22 50:1,3 53:21 55:11,12 56:6 57:9,13,17,18 58:9 62:6 63:10 64:5,7,21,22 65:14 68:25 69:2,10,23 70:11,14,16,18 73:10 76:5,6 79:21 83:2,11 84:15,22 85:3,17,20,23,24 86:7,8 87:8 88:11 92:6,9,10 93:10,12 94:19 95:1,5,7,8,20 96:6,22,25 97:2,3,10 99:5,6,24 100:2,8,10,11 101:1,3,12,20 102:6,19,24 104:8,13 105:12 108:6 109:11 110:16,18 111:6,12,13 112:4</p>	<p>114:16 115:9,10 117:3,12,14,15 119:21 120:2,3,19,20 123:15,21 124:3,4,11,12 128:14 129:25 133:11 134:21 137:9 138:9 139:18 142:20 144:2,22 145:7,14 146:20,23 153:15,18 154:2 155:2,5,6 156:3,7 158:4</p> <p><b>Tatum</b>..... ..9 7:6</p> <p><b>tax</b> 74:9,25</p> <p><b>TAYLOR</b> 3:12</p> <p><b>ten</b> 49:22</p> <p><b>Tendering</b> 21:24</p> <p><b>term</b> 16:2 73:7 104:4 109:10,19 111:14 156:16,20</p> <p><b>terms</b> 12:22 18:12 20:4 21:1 27:3 32:10 34:6,17 40:20 48:11 60:3 87:5,10 89:19 91:15 140:22</p> <p><b>testified</b> 9:2 47:2,25 55:9 65:17 66:23 103:12 156:15 157:13</p> <p><b>testify</b> 18:22 22:23 24:4,14,19 116:23 123:10 125:4 161:6</p> <p><b>testimonies</b> 53:25</p> <p><b>testimony</b> 37:5 42:2,5,7 43:19 50:7 65:8,13,15,23 79:19 87:7 118:20 138:8</p> <p><b>Texan</b> 123:12</p> <p><b>Texas</b> 1:1,9,13 2:3,7,12,13,15 3:1,3,7,9,20,21 4:11,12,14 5:2,20,24 8:4,12,17,19,21,24 9:6,7,19,21,25</p>	<p>13:6,11 14:1,8,13,16,20,25 15:1,4,6,17 17:8,15 18:2,3,8 22:22 23:11 24:5,10,22 25:3,7,25 26:6,16,24 27:12 28:5,15,17 29:3,15,18,23 30:5,7 31:24,25 32:8,9,13,14,23 33:3,10,15,23 34:11,12,16,21 35:2,10,12,22 36:16,20,25 37:10,13,17 38:8,11 39:14,16,23 40:1,3,20,21 41:1,13,17 42:1,18,21 43:17,20 44:2,25 45:13,21 46:7,13,18,22 47:6,13,20 48:6,15,16 49:3,15 50:5,8,10,12,13,17,2 1 51:14 52:8 53:22 54:7 55:4,12,20,23 56:17 58:3,11 59:14,22 60:19 61:10,16,23 62:2,7,15,20,23 63:1,4,11 64:1,8,13,16,22 65:8,24,25 66:16 67:14,18 68:4 71:4,8,12,13,23 72:20,21 73:14 74:8 75:1,22 76:6,13,14,21 77:21,24 78:1,5,10,13,17,20,2 4 79:5 80:17 81:11,12 82:23 83:6,15 85:10,25 86:9,11 87:11,13,17 88:16 89:2,13,14,25 90:9,11,15 92:10,16 93:3 94:7,22 95:9,21 96:2,6,10,13 97:4,11,21</p>
--	--	--

<p>98:2,3,23,25  99:8,12,19,21 100:19  101:21,22,24,25  102:7  103:2,3,9,10,14,24  104:15  105:6,12,13,24  106:14,19,25  107:1,4,8,10,11,15,1  6,20,24,25 108:2,8  114:7,13,17,23  115:2,4,10,11,20,21  116:13 117:17,18  120:4,5 122:15,16  124:12,19  125:1,15,16,22,24  126:3,5,8,9,22,23  127:22,24  128:3,6,14,22 130:20  131:1 132:11  133:3,22 134:14,24  136:9,15 137:16,25  141:8 143:13,23  144:5,7,17 145:9,15  146:1,16,23,25  147:5,7,19  148:14,18,20,21,23  150:2,5,15,16,20  152:7,9,12,18,24  153:18,20  154:6,12,14  155:9,12,13  161:1,3,18,21</p> <p><b>Texas-issued</b> 78:2,3</p> <p><b>Texas-registered</b>  86:17,21 87:20 88:19  89:5,24 90:22  91:1,10</p> <p><b>text</b> 38:16</p> <p><b>thank</b> 9:12 10:3 55:11  70:17 100:18 110:17  158:6,7,8</p> <p><b>that's</b> 9:10 10:25  13:23 14:21,22 15:24  23:8 24:13 25:12  26:2 31:1,17 37:7  41:1,19 43:22 44:3</p>	<p>45:16 46:24 47:14  48:2 50:25 53:4 54:5  56:8 57:13,21,25  59:5 62:13 65:22  66:8 74:18 76:22  80:1 81:18 82:2  85:19 93:10,11 95:12  99:13 103:22,23  105:20 108:4 114:14  117:13,20 118:15,21  123:20 133:11 135:19  136:5,8,9 137:3  139:4,18 140:10  141:5 144:1,20  145:24 146:9 147:14  149:20 151:17 153:25  154:4 155:11 156:19  157:1</p> <p><b>therefore</b> 23:13 24:6</p> <p><b>therein</b> 160:12</p> <p><b>there's</b> 22:16  60:3,4,6 81:25  100:12 111:8 126:4  136:4 141:2</p> <p><b>they're</b> 108:16 122:2  144:12 146:15</p> <p><b>they've</b> 66:17 135:7</p> <p><b>third</b> 136:13</p> <p><b>thirty-five</b> 30:1  31:22 32:12</p> <p><b>thirty-five-year-olds</b>  157:6</p> <p><b>thirty-one</b> 12:18,19</p> <p><b>throughout</b> 20:12,14  38:23,24 51:4</p> <p><b>ties</b> 51:19</p> <p><b>time-related</b> 147:18</p> <p><b>title</b> 15:6 136:5</p> <p><b>today</b> 10:5,25  11:12,23 12:10  19:8,10,17,22  20:18,21 21:10  87:4,9 152:13 155:22  156:16 157:3</p>	<p><b>tonight</b> 8:10</p> <p><b>top</b> 57:24 58:1,10  60:15 70:19 93:5  99:25 117:25 136:4,6  150:14</p> <p><b>topic</b> 23:20 24:4  94:13,19 95:10,16  153:23</p> <p><b>topics</b> 22:24 23:7  24:4,8,12,15,18  109:20 110:8,10</p> <p><b>total</b> 32:7 139:6</p> <p><b>touched</b> 28:6</p> <p><b>towards</b> 55:23 107:6  127:2 131:2,13,17  132:11 133:3 134:14  141:25 147:20 148:11</p> <p><b>train</b> 44:10</p> <p><b>training</b> 37:20 127:10  131:12</p> <p><b>transcript</b> 65:18  161:7</p> <p><b>transcription</b> 10:25</p> <p><b>transportation</b> 147:21</p> <p><b>Trial</b> 5:16</p> <p><b>Tribune</b> 115:21 116:13  117:18 120:4 122:15</p> <p><b>tried</b> 71:5</p> <p><b>trip</b> 80:3</p> <p><b>trips</b> 135:4,5</p> <p><b>true</b> 160:2 161:4,7</p> <p><b>truth</b> 161:6</p> <p><b>truthful</b> 12:1,5 24:10</p> <p><b>truthfully</b> 11:20 12:9</p> <p><b>try</b> 10:23 28:14 29:24  40:14</p> <p><b>trying</b> 13:24 66:20  155:23</p> <p><b>turn</b> 22:12 59:1  126:19</p>
--	--	--

<p><b>turned</b> 146:15</p> <p><b>turning</b> 81:19 109:16</p> <p><b>type</b> 95:4 151:3</p> <p><b>typewriting</b> 161:6,7</p> <p><b>typical</b> 17:8,10</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p><b>U.S</b> 5:17 10:2 72:21,22</p> <p><b>uh-huh</b> 13:25 14:2 15:2 17:7 22:3 23:4 25:17 28:1 29:17 35:17 36:3,7,11 37:8,15,24 38:2,24 40:2,4,25 41:5 42:4 43:3,15 45:9 51:12 53:10,14 55:3 56:5,16,19 57:4 59:2,18 60:17 61:7,15 62:5,13 63:19 65:6,7,22 73:11 77:7 79:12 81:15 84:7 88:5,8,18 92:15 93:14 94:3 96:19 97:13 98:16 100:15 104:14 106:13,18 108:7 109:15 110:1,19 112:1 116:9 120:8 121:19 122:3,11 123:4,20 124:23 125:8,21 126:18 130:3,11 132:6 133:10 138:19,23,25 139:5 144:15 149:25 151:7 152:17</p> <p><b>ultimate</b> 37:9,11</p> <p><b>ultimately</b> 98:24 103:13</p> <p><b>unable</b> 19:3 84:16 86:2,12,18 87:14,21 88:20 89:6,15 90:1,10,17,23 91:2 148:15,24 149:2</p> <p><b>underlying</b> 72:11</p>	<p>120:1 125:5 147:22</p> <p><b>underneath</b> 136:9</p> <p><b>understand</b> 11:4,6,9,16,18,21 39:6,17 88:3,7,9,25 89:17,18 94:19,24 97:24 104:9,12 106:24 113:8 117:22 119:23 121:15</p> <p><b>understanding</b> 23:14 24:3 139:19</p> <p><b>understood</b> 70:9 76:4</p> <p><b>undertake</b> 133:23</p> <p><b>unilateral</b> 37:2</p> <p><b>UNION</b> 3:15</p> <p><b>United</b> 1:1,8 2:1 5:14 34:4,6,7,13 35:4 158:3</p> <p><b>universe</b> 129:16</p> <p><b>universities</b> 44:9 46:13 47:3,5</p> <p><b>University</b> 4:12 13:6,11 14:1,9 115:21 116:13 117:18 120:5 122:15</p> <p><b>unless</b> 11:15</p> <p><b>unnecessarily</b> 70:24</p> <p><b>upcoming</b> 56:15 57:19</p> <p><b>update</b> 47:24</p> <p><b>updates</b> 49:7</p> <p><b>upon</b> 127:6,7 135:6</p> <p><b>Urban</b> 59:24</p> <p><b>usual</b> 99:13 100:20 101:23 102:1,8 103:11,15</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p><b>vague</b> 64:4</p> <p><b>vagueness</b> 29:21 64:20 83:9 96:5 103:6 105:9 109:10</p>	<p><b>vain</b> 103:2</p> <p><b>VAN</b> 52:21,23</p> <p><b>variety</b> 38:14</p> <p><b>various</b> 31:20,24 45:12 114:7 134:2,3</p> <p><b>VEASEY</b> 1:3</p> <p><b>verbal</b> 10:16 16:22 31:23 42:11 61:24 62:10 100:22 103:8,17 109:13 126:16</p> <p><b>via</b> 5:15</p> <p><b>View</b> 81:24 82:13 83:13</p> <p><b>Vinson</b> 4:11 6:2 161:2,18</p> <p><b>violations</b> 111:17</p> <p><b>vision</b> 15:19,20,23</p> <p><b>visit</b> 38:19 46:13</p> <p><b>visited</b> 44:8</p> <p><b>visiting</b> 38:17</p> <p><b>Vo</b> 42:24 43:1,2,3</p> <p><b>V-O</b> 43:1</p> <p><b>voice</b> 41:14</p> <p><b>voices</b> 53:12,14 123:8,16 124:5,13,20</p> <p><b>volunteer</b> 31:24</p> <p><b>volunteered</b> 28:19 62:22</p> <p><b>volunteering</b> 29:5</p> <p><b>volunteers</b> 39:10 51:10 151:22</p> <p><b>Vota</b> 39:24 59:23</p> <p><b>vote</b> 18:17 19:3 28:21 29:8 36:24 37:19 38:5 39:24 51:2,18 52:5 54:13 58:22 60:11 71:6 72:15,17 74:24 75:2 82:14 84:16 85:13</p>
---	--	---

<p>86:2,12,18  87:3,15,21 88:20  89:7,15 90:1 91:16  92:12,19,20,22 93:1  95:19 105:20,22  106:15,20  107:2,5,13,17,18,23  108:1,2,9,10,11,13,2  3,24,25 109:6 110:25  111:1  113:5,11,21,23,25  114:3,5 116:1,18  118:4,24,25 119:7  120:14 121:3,9  122:2,22 123:2 127:2  129:8,12,22,23  131:21 132:16  134:3,4 135:18,21  137:23 138:16 143:4  144:9 147:12  149:7,15,24 151:1,24  153:3</p> <p><b>voted</b> 18:19 19:1 85:6  94:8 95:22 103:25  104:16,18,25 105:4  114:21 126:1  129:12,20 135:21  153:5</p> <p><b>voter</b> 8:10,17,19,21  37:18 38:5,6 44:3,13  45:2,11,14,23  46:8,11,14,19,23  47:14,21 48:7,11,17  49:17 50:6,9,22  51:14,16,23,24  52:23,24 53:2  54:24,25 55:1,14,22  57:4 58:22 59:4 60:5  67:20,21 68:6  86:17,21 87:20 88:19  89:5,24 90:22  91:1,10  108:3,15,17,21  109:3,10,18  110:3,11,21  111:2,11,14,17 112:2  113:2  114:7,8,9,12,18</p>	<p>115:2,12 121:13,22  126:9 128:22 129:17  131:10,11 136:14  140:24,25 143:12,24  144:6 145:8,22,25  146:2,5,6,10,11,13,1  4,17,18,24  147:3,8,11 151:15  152:6 153:3  154:2,4,8</p> <p><b>voters</b> 2:3 5:3  8:4,6,8,13  9:19,22,25  14:10,14,17 15:1  22:22 23:12 26:1  40:21 44:9 47:4  48:2,23 50:18 52:10  53:3 60:22 61:10  71:24,25 73:15,16  82:4 94:20 105:22  106:15,16,21 107:2  115:23,24 116:16  118:2 119:5 120:12  121:1,7,25 122:20,25  127:3,8,14,15 134:24  143:2,13,24  144:5,8,14 145:8,16  146:6 147:8,21  149:14  150:2,5,17,18,21  151:6</p> <p><b>voting</b> 5:16 8:16  41:25 42:3 44:18  47:8 51:17,21 52:2,3  69:5 70:4,21,22 82:7  108:15 111:16 113:17  127:23,25 128:4,5  129:15 143:18,21  144:16</p> <p><b>VR</b> 151:17 152:1,5</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p><b>Wait</b> 66:19 93:20</p> <p><b>walking</b> 149:18</p> <p><b>Washing</b> 69:8</p> <p><b>Washington</b> 2:4 5:3,6  8:13 61:11,18</p>	<p>63:3,6,11 69:4,11,24  <b>wasn't</b> 91:7,16 93:24  116:4 137:23 142:11  <b>ways</b> 30:3 31:15 32:1  38:14 49:11 58:19  136:18 137:10  <b>website</b> 31:19  <b>we'd</b> 110:12  <b>Wednesday</b> 20:18  <b>weekends</b> 135:11  <b>weeks</b> 19:25  <b>we'll</b> 33:9 41:9  119:18 156:5  <b>we're</b> 34:2 35:8 50:1  73:12 120:15 127:12  131:22 132:16,22  135:8,14 149:8,15,21  150:8 151:16 152:2  153:16  <b>we've</b> 9:15 18:7 28:15  54:10 62:6 67:7  71:16,17 74:2 91:13  93:3 94:14 116:23  119:14 127:11 135:5  153:5 155:18  <b>whatever</b> 11:9 136:5  <b>whatsoever</b> 116:21  <b>whether</b> 36:25 80:19  85:12 95:22  120:16,17 124:1,2  155:8  <b>white</b> 72:8 106:12  <b>whole</b> 27:19 33:8  <b>who's</b> 31:13 123:11  <b>whose</b> 32:22 160:11  161:9  <b>Williams</b> 16:24 67:17  79:12,23 80:5  <b>WilmerHale</b> 5:5 9:21  10:10  <b>window</b> 47:19</p>
--	---	---

<p><b>Wisconsin</b> 49:1</p> <p><b>wishes</b> 125:1,16,24</p> <p><b>witness</b> 4:7 29:22 35:17 36:3,7 55:10 57:12 69:18 85:22 88:5,8 91:20,23,25 92:2,4 95:15 96:23 101:16 102:23 110:12 112:1 125:8 155:20 156:4 157:24 158:7 159:2 161:4,5</p> <p><b>wondering</b> 102:24</p> <p><b>work</b> 26:21 35:8 40:2,3,4,5 41:18,22 42:20 43:6 49:16 58:12 65:2 67:2 68:8,16 75:10 136:17 147:11 153:14</p> <p><b>worked</b> 42:12,21 123:5,11</p> <p><b>workshop</b> 59:4,13 60:1,3</p> <p><b>workshops</b> 45:12 60:12</p> <p><b>worries</b> 56:9</p> <p><b>write</b> 134:1</p> <p><b>written</b> 42:1</p> <p><b>wrong</b> 69:1</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p><b>y'all</b> 27:23 38:18 40:3 43:23 85:17 94:21 154:2</p> <p><b>Yannis</b> 154:17,25</p> <p><b>year's</b> 141:11</p> <p><b>yesterday</b> 19:23 20:6,15</p> <p><b>yet</b> 70:12</p> <p><b>York</b> 5:11</p> <p><b>you'll</b> 68:21</p> <p><b>young</b> 2:3 5:2 8:4,6,8,13 9:19,21,25</p>	<p>14:10,14,17 15:1 22:22 23:12 26:1 32:11,19 33:6 34:2,18 40:21 48:23 54:1 61:10 82:4 115:17 127:1 134:24 135:16 143:2,13 144:5 145:8,16 147:21 157:7</p> <p><b>yourself</b> 17:25</p> <p><b>youth</b> 40:2 41:24 42:3</p> <p><b>you've</b> 22:21 24:9 61:6 62:7 103:11 119:23 122:9 156:16,20 157:2</p>	
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